# INDIA Michael

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence Governor

Thomas W. Easterly Commissioner

100 North Senate Avenue Indianapolis, Indiana 46204 (317) 232-8603 Toll Free (800) 451-6027 www.idem.IN.gov

# NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a Part 70 Operating Permit

for Genpak, LLC in Scott County

Permit No. T143-31697-00016

The Indiana Department of Environmental Management (IDEM) has received an application from Genpak, LLC located at 845 South Elm Street, Scottsburg, Indiana for a renewal of its Part 70 Operating Permit No.: T143-24660-00016, issued on December 31, 2007. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Genpak, LLC to continue to operate its existing source.

This draft Part 70 Operating Permit Renewal does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed or removed. These corrections, changes, and removals may include Title I changes (i.e., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow for these changes.

A copy of the permit application and IDEM's preliminary findings are available at:

Scott County Public Library 108 South Main Street Scottsburg, IN 47170

and

IDEM Southeast Regional Office 820 West Sweet Street Brownstown, Indiana 47220-9557

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

# How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number T143-31697-00016 in all correspondence.

#### Comments should be sent to:

Donald McQuigg
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-4240
Or dial directly: (317) 234-4240
Fax: (317) 232-6749 attn: Donald McQuigg

E-mail: dmcquigg@idem.in.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: <a href="https://www.idem.in.gov">www.idem.in.gov</a>.

# What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public files room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251 and IDEM Southeast Regional Office, 820 West Sweet Street, Brownstown, Indiana 47220-9557.

If you have any questions please contact Donald McQuigg of my staff at the above address.

Chrystal A. Wagner, Section Chief

Permits Branch
Office of Air Quality

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

DEM

We Protect Hoosiers and Our Environment.

Michael R. Pence Governor

Thomas W. Easterly
Commissioner

DRAFT

100 North Senate Avenue Indianapolis, Indiana 46204 (317) 232-8603 Toll Free (800) 451-6027 www.idem.IN.gov

# Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

# Genpak, LLC 845 South Elm Street Scottsburg, Indiana 47170

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T143-31697-00016			
Issued by:	Issuance Date:		
Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Expiration Date:		



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Genpak, LLC Scottsburg, Indiana Permit Reviewer: Donald McQuigg

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#### **SECTION A SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

#### General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)] A.1

The Permittee owns and operates a stationary expandable polystyrene (EPS) foam food trays and cups extrusion operation.

Source Address: 845 South Elm Street, Scottsburg, Indiana 47170

General Source Phone Number: (812) 752-3111

SIC Code: 3086 County Location: Scott

Source Location Status: Attainment for all criteria pollutants Source Status: Part 70 Operating Permit Program

Minor Source, under PSD

Minor Source, Section 112 of the Clean Air Act

Not 1 of 28 Source Categories

Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)] A.2 This stationary source consists of the following emission units and pollution control devices:

- (a) Food trays production line:
  - Three (3) polystyrene foam extrusion operations identified as EPS-1, EPS-2 and (1) EPS-3, each extruding a maximum of 1,400 pounds per hour polystyrene consisting of the following:
    - (A) Two (2) polystyrene foam scrap regrinders, identified as Regrind-1 and Regrind-2, each with a maximum capacity of 1,266 pounds per hour, using fabric filters as control.
    - (B) Four (4) fluff silos.
    - (C) One (1) polystyrene scrap repelletizer, identified as Repel-1.

VOC emissions from Repel-1 are primarily controlled by a 20.9 MMBtu/hour natural gas-fired boiler, identified as B-1, exhausting to stack S-1. Alternatively, the emissions can be controlled by the 1.0 MMBtu/hr Recuperative Thermal Oxidizer, exhausting through INCIN-1;

- (b) Cup production line:
  - Mold machines, identified as M-1, molding a maximum of 833 pounds per hour of (1) pre-expandable resin beads containing blowing agent and exhausting to the interior of the building,
  - (2)One (1) Pre-Expansion Room, identified as the Pre-Expansion Room, expanding a maximum of 833 pounds per hour of pre-expandable resin beads containing blowing agent, utilizing a boiler to control VOC emissions, exhausting to S-1, and consisting of:



- (A) Material Preparation;
- (B) Pre-Expander, identified as PE-1;
- (C) Pre-Puff, identified as PP-1; and
- (D) One (1) natural gas-fired boiler, identified as B-1, exhausting to stack S-1, with a rated heat input capacity of 20.9 MMBtu per hour.

# A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

This stationary source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour;
  - (1) Three (3) process dryers with combined maximum heat input capacity of 1.5 million British thermal units per hour (MMBtu/hr);
  - (2) Fourteen (14) gas unit heaters with combined maximum heat input capacity of 2.0 MMBtu per hour;
  - (3) Three (3) air makeup units with combined maximum heat input of 8.2 MMBtu per hour:
- (b) The following VOC and HAP storage container: Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids with capacities less than forty cubic meters (40m³);
- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6; [326 IAC 8-3-2] [326 IAC 8-3-8]
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: cutting torches and welding equipment for maintenance;
- (e) Closed loop heating and cooling systems;
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (g) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4]
- (h) Enclosed systems for conveying plastic raw materials and plastic finished goods;
- Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (j) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: five (5) trim grinders;
- (k) Other activities or categories of activities with emissions equal to or less than insignificant thresholds:
  - (1) One (1) 30,000 gallons storage tank, constructed on December 1, 1998, containing the blowing agents (confidential information), designed to operate in excess of 204.9 kPa and without emissions to the atmosphere;

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- (I) APET-1 Plastic Extruder, constructed in 1998, with a maximum production rate of 2,100 pounds per hour of polystyrene sheets. This process does not use a VOC blowing agent; and
- (m) APET-2 Plastic Extruder, constructed in 2003, with a maximum production rate of 2,100 pounds per hour of polystyrene sheets. This process does not use a VOC blowing agent.

# A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 Applicability).

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# **SECTION B**

#### **GENERAL CONDITIONS**

# B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

# B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T143-31697-00016, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

# B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

# B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

# B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

# B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

# B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

# B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:



- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and
- (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

# B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

# B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices:
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

# B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Southeast Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,

Compliance and Enforcement Branch), or

Telephone Number: 317-233-0178 (ask for Office of Air Quality,

Compliance and Enforcement Branch) Facsimile Number: 317-233-6865

Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).



- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

# B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:



- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

# B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T143-31697-00016 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

# B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

- B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]
  - (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
  - (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
    - (1) That this permit contains a material mistake.



- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

# B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit;
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

# B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:



Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

# B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

# B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590



in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
  The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
  The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.
- B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

# B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

# B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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# B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

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#### **SECTION C**

#### **SOURCE OPERATION CONDITIONS**

# **Entire Source**

# Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

# C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

# C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

# C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

# C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

# C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

# C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of



326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
  The Permittee shall comply with the applicable emission control procedures in
  326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control
  requirements are applicable for any removal or disturbance of RACM greater than three (3)
  linear feet on pipes or three (3) square feet on any other facility components or a total of at
  least 0.75 cubic feet on all facility components.
- (f) Demolition and Renovation The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Licensed Asbestos Inspector
  The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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T143-31697-00016 Permit Reviewer: Donald McQuigg

# Testing Requirements [326 IAC 2-7-6(1)]

# Performance Testing [326 IAC 3-6]

For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than (c) forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

# Compliance Requirements [326 IAC 2-1.1-11]

#### C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

# Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

#### C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.



The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

- (b) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (c) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

# C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

# Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

# C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

# C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

# C.14 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5] [326 IAC 2-7-6]

(I) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, in this permit:



- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

(II)

- (a) CAM Response to excursions or exceedances.
  - Upon detecting an excursion or exceedance, subject to CAM, the Permittee (1) shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
  - (2) Determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

- (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
- (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a QIP. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
- (d) Elements of a QIP:
  The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
  - (1) Failed to address the cause of the control device performance problems; or
  - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) CAM recordkeeping requirements.
  - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(a)(2) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.
  - (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

# C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

# Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

  Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Quality 100 North Senate Avenue MC 61-50 IGCN 1003 Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

# C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:
  - (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.

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- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

# C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [40 CFR 64][326 IAC 3-8]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

# **Stratospheric Ozone Protection**

# C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

# **Emissions Unit Description:**

- (a) Food trays production line:
  - (1) Three (3) polystyrene foam extrusion operations identified as EPS-1, EPS-2 and EPS-3, each extruding a maximum of 1,400 pounds per hour polystyrene consisting of the following:
    - (A) Two (2) polystyrene foam scrap regrinders, identified as Regrind-1 and Regrind-2, each with a maximum capacity of 1,266 pounds per hour, using fabric filters as control.
    - (B) Four (4) fluff silos.
    - (C) One (1) polystyrene scrap repelletizer, identified as Repel-1.

VOC emissions from Repel-1 are primarily controlled by a 20.9 MMBtu/hour natural gas-fired boiler B-1, exhausting to stack S-1. Alternatively, the emissions can be controlled by the 1.0 MMBtu/hr Recuperative Thermal Oxidizer, exhausting through INCIN-1;

- (b) Cup production line:
  - (1) Mold machines, identified as M-1, molding a maximum of 833 pounds per hour of pre-expandable resin beads containing blowing agent and exhausting to the interior of the building,
  - (2) Pre-Expansion Room, identified as the Pre-Expansion Room, expanding a maximum of 833 pounds per hour of pre-expandable resin beads containing blowing agent, utilizing a boiler to control VOC emissions, exhausting to S-1, and consisting of:
    - (A) Material Preparation;
    - (B) Pre-Expander, identified as PE-1;
    - (C) Pre-Puff, identified as PP-1; and
    - (D) One (1) natural gas-fired boiler B-1, exhausting to stack S-1, with a rated heat input capacity of 20.9 MMBtu per hour.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

# Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Volatile Organic Compounds (VOC) BACT and Minor PSD Limits [326 IAC 8-1-6] [326 IAC 2-2]
  - (a) Pursuant to 326 IAC 8-1-6 and Significant Source Modification 143-25032-00016, the Best Available Control Technology (BACT) for the food trays production line emission units shall be the following:
    - (1) The VOC emissions from the polystyrene foam scrap repelletizer, Repel-1, shall be controlled by either the 20.9 MMBtu/hour boiler B-1 or the 1.0 MMBtu/hr RTO. The boiler B-1 and the 1.0 MMBtu/hr RTO each shall have a minimum destruction efficiency of 95%.



- (2) The capture system for the repelletizer, Repel-1 shall have a minimum capture efficiency of 85%.
- (3) The blowing agent input to the three (3) polystyrene foam extrusion operations (EPS-1, EPS-2 and EPS-3) shall be limited to 906.66 tons per twelve (12) month consecutive period.
- (4) No add-on controls are required for the fluff silos.

Compliance with this condition shall limit the combined VOC emissions to less than 171.12 tons per twelve (12) consecutive month period from the extrusion, warehouse, thermoform, repelletizer, and the fluff silos.

- (b) Pursuant to Significant Source Modification 143-11382-00016, issued on February 10, 2000 and 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the Pre-Expansion Room shall be the following:
  - (1) The blowing agent input to the Foam Cup Production Line shall be limited to 182 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This blowing agent input limit shall limit the VOC emissions from the Pre-Expansion Room and Mold Machines (M-1) to 64.36 tons of VOC emissions per 12 consecutive month period.
  - (2) The VOC emissions from the Pre-Expansion Room shall be controlled by the 20.9 MMBtu/hour Boiler. The Boiler shall have a minimum destruction efficiency of 95%. The Boiler shall be used at all times that the Pre-Expansion Room is in operation.
  - (3) The capture system for the Pre-Expansion Room shall have a minimum capture efficiency of 95%.
  - (4) No add-on controls are required for the Mold Machines, identified as M-1.
- (c) Pursuant to this permit, VOC emissions shall be limited to less than 250 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this condition shall satisfy the requirements of 326 IAC 8-1-6 (General Reduction Requirements). Compliance with this condition shall render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

# D.1.2 Prevention of Significant Deterioration Minor Limits [326 IAC 2-2]

- (a) The total PM emissions from the two (2) polystyrene foam scrap regrinders controlled by fabric filters shall not exceed the 54.8 pounds per hour.
- (b) The total PM<sub>10</sub> emissions from the two (2) polystyrene foam scrap regrinder controlled by fabric filters shall not exceed the 54.8 pounds per hour.

Compliance with these emission limitations shall render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

# D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies), the allowable PM emission rate from each of the two (2) polystyrene foam scrap regrinders shall not exceed 3.02 pounds per hour when operating at a process weight rate of 1266 pounds per hour.

The pound per hour limitation was calculated with the following equation:

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Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$
 where  $E =$ rate of emission in pounds per hour  $P =$ process weight rate in tons per hour

# D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and the associated control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

# **Compliance Determination Requirements**

# D.1.5 Particulate Matter (PM)

In order to comply with Condition D.1.2, the fabric filters for PM control shall be in operation and control emissions from the polystyrene foam scrap regrind operation at all times that this facility is in operation.

# D.1.6 Volatile Organic Compound (VOC)

- (a) In order to comply with Condition D.1.1(a), the boiler B-1 or the RTO shall control emissions from the polystyrene foam repelletizer, Repel-1, at all times that the process is in operation.
- (b) In order to comply with Condition D.1.1(b), the boiler B-1 controlling VOC emissions from the Pre-Expansion Room shall operate at all times that the process is in operation.
- (c) Compliance with the blowing agent input limit to the Foam Cup Line required in Condition D.1.1(b) shall be determined using the following equation:

$$B_u = \sum_{i=1}^{n} (E_b) * (P_c)$$

where:

 $B_u$  = Monthly blowing agent input, (tons/month).

E<sub>b</sub> = Pre-expanded beads usage during the month, (tons/month)

P<sub>c</sub> = Percentage of blowing agent in the pre-expanded beads, (%)

<sup>n</sup> = Number of types of pre-expanded beads used during the month

= Pre-expanded bead type

# D.1.7 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Condition D.1.1(a) and (b), the Permittee shall perform VOC testing, including efficiency of the repelletizer Repel-1 and Pre-Expansion Room capture systems and destruction efficiency of the 20.9 MMBtu/hr Boiler, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with Section C Performance Testing.
- (b) In order to demonstrate compliance with Condition D.1.1(a), the Permittee shall perform VOC testing, including efficiency of the repelletizer Repel-1 capture system and destruction efficiency of the 1.0 MMBtu/hr RTO at least once every five (5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with Section C Performance Testing.
- (c) In order to demonstrate compliance with Conditions D.1.2 and D.1.3, the Permittee shall perform PM and PM<sub>10</sub> testing for the fabric filters controlling the two (2) polystyrene foam

scrap regrinders at least once every five (5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing. PM<sub>10</sub> includes filterable and condensable PM<sub>10</sub>.

# Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

## D.1.8 Visible Emissions Notations

- (a) Visible emission notations of the stack exhausts from fabric filters controlling the two (2) polystyrene foam scrap regrinders shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

# D.1.9 Fabric Filters Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the fabric filters controlling the two (2) polystyrene foam scrap regrinders at least once per day when the emission unit is in operation.
- (b) When, for any one reading, the pressure drop across the baghouse is outside of the normal range, the Permittee shall take a reasonable response step. The normal range for this unit is a pressure drop between 1 and 6 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (c) The instrument used for determining the pressure shall comply with Section C Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months or other time period specified by the manufacturer. The Permittee shall maintain records of the manufacturer specifications, if used.

# D.1.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions), or

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, or leaks, or dust traces.

# D.1.11 Parametric Monitoring

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day for the boiler B-1 or RTO whenever each control is operating. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained at a minimum operating fan amperage of twelve (12) amps or within the normal range as established in the most recent valid compliant stack test.

# D.1.12 Boiler Operating Temperature

In order to comply with the PSD minor limit and BACT limit in Condition D.1.1, the Permittee shall meet the following:

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the 20.9 MMBtu/hr boiler B-1 for measuring operating temperature when controlling the VOC emissions from the repelletizer, Repel-1. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the boiler B-1 at or above the 3-hour average temperature of 1,400°F.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with the limits in Condition D.1.1 as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the boiler B-1 at or above the 3-hour average temperature as observed during the compliance stack test.

#### D.1.13 RTO Operating Temperature

In order to comply with the PSD minor limit and BACT limit in Condition D.1.1, the Permittee shall meet the following:

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the 1.0 MMBtu/hr RTO for measuring operating temperature, when controlling the VOC emissions from the Repelletizer, Repel-1. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the RTO at or above the 3-hour average temperature of 1,400°F.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with the limits in Condition D.1.1 as approved by IDEM.



(c) On and after the date the approved stack test results are available, the Permittee shall operate the 1.0 MMBtu/hr RTO at or above the 3-hour average temperature as observed during the compliant stack test.

# D.1.14 Boiler and RTO Compliance Assurance Monitoring (CAM) [40 CFR Part 64]

- (a) Pursuant to 40 CFR Part 64, the Permittee shall comply with the following Compliance Assurance Monitoring requirements for the 20.9 MMBtu/hr boiler B-1 and the 1.0 MMBtu/hr RTO controlling the repelletizer Repel-1:
  - (1) Monitoring Approach for the Capture System on the Repelletizer Repel-1.

I. Indicator	Work Practice
Measurement Approach	Inspect the operational condition of the control device and the integrity of the exhaust system from the process to the control device.
	Record duct pressure and fan amperage established during the most recent stack tests.
II. Indicator Range	An excursion of the duct pressure and fan amperage is identified as any finding that the integrity of the exhaust system ductwork has been compromised.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria	
A. Data Representativeness	Leak-free ductwork of the process will assure that all of the exhaust will reach the control device. Inspections will identify problems.
B. Verification of Operational Status	Inspection records.
C Monitoring Frequency	Once Daily
Data Collection Procedure	Record results of inspections and observations.
D. Recordkeeping	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.
E. Reporting	Number, duration, cause of any excursion and the corrective action taken.
Reporting Frequency	Quarterly

(2) Monitoring Approach for the 20.9 MMBtu/hr Boiler B-1 and the 1.0 MMBtu/hr RTO Controlling the Repelletizer, Repel-1:

		Indicator #1	Indicator #2	Indicator #3
I.	Indicator	Boiler and RTO combustion zone temperature.	Work practice/inspection.	Performance tests
	Measurement Approach	Continuously monitor the operating temperature of the Boiler and the RTO combustion zone, whichever control is used.	Inspect internal and external structural integrity of Boiler and RTO to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.
11.	Indicator Range	An excursion is identified as a measurement of 50°F less than the average temperature demonstrated during the most recent compliance demonstration, or as any 3-hour period when the average temperature is less than the average temperature demonstrated during the most recent compliance demonstration.	An excursion is identified as any finding that the structural integrity of the Boiler and the RTO has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the Boiler and the RTO does not meet the permitted destruction efficiency.
	Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
Ш	. Performance Criteria			
A.	Data Representativeness	Any temperature-monitoring device employed to measure the control combustion zone temperature shall be accurate to within 1.0% of temperature measured or ±1°C, whichever is greater.	Inspections of the Boiler and RTO will identify problems.	A test protocol shall be prepared and approved by the IDEM prior to conducting the performance test.

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	Indicator #1	Indicator #2	Indicator #3
B. Verification of Operational S			Not applicable.
C. QA/QC Pract Criteria	validation of temperature system conducted annually. Acceptance criteria ± 20°F.	Not applicable.	EPA test methods approved in protocol.
D. Monitoring Frequency	Measured continuously	External Inspection – annually Internal inspection – annually.	Once every five years.
Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.
Averaging Pe	riod Not applicable if using any measured value as indicator. Three hours i using 3-hour average as indicator.		Not applicable.
E. Record Keep	Maintain for a period of 5 years records of char recorder paper or electronic media and corrective actions taker in response to excursions.	t 5 years records of inspections, including dates and initials of	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to IDEM at least 35 days prior to test date. Submit test report 45 days after conducting a performance test.
Frequency	Quarterly.	Annually.	For each performance test conducted.

- (b) Pursuant to 40 CFR Part 64, the Permittee shall comply with the following Compliance Assurance Monitoring requirements for the 20.9 MMBtu/hr Boiler B-1 controlling the Pre-Expansion Room:
  - (1) Monitoring Approach for the Capture System on the Pre-Expansion Room.

I. Indicator	Work Practice
Measurement Approach	Inspect the operational condition of the control device and the integrity of the exhaust system from the process to the control device.
	Record duct pressure and fan amperage established during the most recent stack tests.
II. Indicator Range	An excursion of the duct pressure and fan amperage is identified as any finding that the integrity of the exhaust system ductwork has been compromised.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria	
A. Data Representativeness	Leak-free ductwork of the process will assure that all of the exhaust will reach the control device. Inspections will identify problems.
B. Verification of Operational Status	Inspection records.
C. Monitoring Frequency	Once Daily
Data Collection Procedure	Record results of inspections and observations.
D. Recordkeeping	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.
E. Reporting	Number, duration, cause of any excursion and the corrective action taken.
Reporting Frequency	Quarterly

# (2) Monitoring Approach for the 20.9 MMBtu/hr Boiler B-1 Controlling the Pre-Expansion Room:

	Indicator #1	Indicator #2	Indicator #3
I. Indicator	Boiler combustion zone temperature.	Work practice/inspection.	Performance test
Measurement Approach	Continuously monitor the operating temperature of the Boiler combustion zone.	Inspect internal and external structural integrity of Boiler to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.

		Indicator #1	Indicator #2	Indicator #3
II. Indicator Ra	ange	An excursion is identified as a measurement of 50°F less than the average temperature demonstrated during the most recent compliance demonstration, or as any 3-hour period when the average temperature is less than the average temperature demonstrated during the most recent compliance demonstration.	An excursion is identified as any finding that the structural integrity of the Boiler has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the Boiler does not meet the permitted destruction efficiency.
Corrective	Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performand	ce Criteria			
A. Data Representa	ativeness	Any temperature- monitoring device employed to measure the Boiler combustion zone temperature shall be accurate to within 1.0% of temperature measured or ±1°C, whichever is greater.	Inspections of the Boiler system will identify problems.	A test protocol shall be prepared and approved by the IDEM prior to conducting the performance test.
B. Verification Operationa		Temperatures recorded on chart paper or electronic media. The Permittee must have valid data from at least 90 percent of the hours during which the process operated.	Inspection records.	Not applicable.
C. QA/QC Pra Criteria	actices and	Validation of temperature system conducted annually. Acceptance criteria ± 20°F.	Not applicable.	EPA test methods approved in protocol.
D. Monitoring Frequency		Measured continuously	External Inspection – annually Internal inspection – annually.	Once every five years.

	Indicator #1	Indicator #2	Indicator #3
Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.
Averaging Period	Not applicable if using any measured value as indicator; Three hours if using 3-hour average as indicator.	Not applicable.	Not applicable.
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to IDEM at least 35 days prior to test date. Submit test report 45 days after conducting a performance test.
Frequency	Quarterly.	Annually.	For each performance test conducted.

# D.1.15 Fabric Filters Compliance Assurance Monitoring (CAM) [40 CFR Part 64]

Pursuant to 40 CFR Part 64, the Permittee shall comply with the following Compliance Assurance Monitoring requirements for the fabric filters controlling the polystyrene foam scrap regrinder (Regrind-1):

# (a) Monitoring Approach -

PARAMETER	INDICATOR NO. 1	INDICATOR NO. 2	INDICATOR NO. 3
I. Indicator Measurement	PM/ and PM10 Concentration	Visible Emissions	Fabric Filters Condition
Approach	U.S. EPA Method 5 and Method 201A or other Methods approved by the Commissioner – Fabric Filters for Regrind-1	Method 9 visual observations.	Visual inspection.
II. Indicator Range	PM/PM10 emissions limit of 54.8 pounds/hr each Pressure drop range of 1.0 to 6.0 inches	Abnormal emissions are observed	An excursion is defined as failure to perform the monthly inspection.
III. Performance Criteria			
A. Data Representativeness	Stack Testing	Procedures addressed in	Fabric Filters inspected visually for

		Method 9	leaks.
B. QA/QC Practices and Criteria	U.S. EPA Method 5 and Method 201A or other Methods approved by the Commissioner – Fabric Filters for Regrind-1	Use of a certified visible emission observer.	Trained personnel perform inspections and maintenance.
C. Monitoring Frequency	Once every 5 years.	once daily when Regrind-1 is operating unless inclement weather.	Monthly
D. Data Collection Procedures	U.S. EPA Method 5, Method 201A or other Methods approved by the Commissioner	Daily visual observations are recorded	Results of inspections and maintenance activities performed are recorded in the maintenance log.
E. Recordkeeping	Maintain for a period of 5 years until another test is conducted.  Maintain for a period of 5 years of corrective actions taken in response to the pressure drop excursion	Maintain for a period of 5 years records of visible emission notations	Maintain for a period of 5 years of corrective actions taken in response to excursions.
F. Reporting	Submit test protocol and notification of testing to IDEM at least 35 days prior to test date. Submit test report 45.		
Frequency	For each performance test conducted.		

# Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

# D.1.16 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1, D.1.12, and D.1.13, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the usage of the blowing agent limits and/or the VOC emission limits established in Conditions D.1.1, D.1.12, and D.1.13.
  - (1) The total usage of the blowing agent in food trays production line for each month;
  - (2) The total usage of blowing agent at the cup production line as calculated using equation in Condition D.1.6(c) for each month
  - (3) The weight of VOCs emitted for each compliance period;
  - (4) The Permittee shall maintain continuous temperature records of the (on a three-hour average basis) of the boiler B-1 and the 1.0 MMBtu/hr RTO and the three-hour average temperature used to demonstrate compliance during the most recent compliant stack test.



- (b) To document the compliance status with Condition D.1.8, the Permittee shall maintain a daily record of visible emission notations of the stacks exhaust from the fabric filters controlling the two (2) polystyrene foam scrap regrinders. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) To document the compliance status with Condition D.1.9, the Permittee shall maintain a daily record of the pressure drop across the fabric filters controlling the two (2) polystyrene foam scrap regrinders. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of pressure drop reading (e.g. the process did not operate that day).
- (d) To document the compliance status with Condition D.1.11, the Permittee shall maintain once per day records of the boiler B-1 and 1.0 MMBtu/hr RTO duct pressure or fan amperage. The Permittee shall include in its daily record when duct pressure or fan amperage is not taken and the reason for the lack of duct pressure or fan amperage notation (e.g. the process being controlled by the boiler and the 1.0 MMBtu/hr RTO did not operate that day, etc.).
- (e) To document the compliance status with Condition D.1.14 the Permittee shall maintain records of the 1.0 MMBtu/hr RTO and boiler B-1, including the capture system, inspections. These records shall include as a minimum, dates, initials of the person performing the inspections, results, and corrective actions taken in response to excursions as required by the CAM for the repelletizer, repel-1, and the Pre-Expansion Room.
- (f) To document the compliance status with Condition D.1.15 the Permittee shall maintain records of the fabric filters inspections. These records shall include as a minimum, dates, initials of the person performing the inspections, results, and corrective actions taken in response to excursions as required by the CAM for the two (2) polystyrene foam scrap regrinders.
- (g) Section C General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

# D.1.17 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligations with regard to the records required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

#### SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### **Emissions Unit Description:**

(a) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6; [326 IAC 8-3-2] [326 IAC 8-3-8]

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

# Emission Limitations and Standards [326 IAC 2-7-5(1)]

# D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the degreasing operation without a remote solvent reservoir is subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements) because they were constructed after July 1, 1990.

- (a) The Permittee shall ensure the following control equipment and operating requirements are met:
  - (1) Equip the degreaser with a cover.
  - (2) Equip the degreaser with a device for draining cleaned parts.
  - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
  - (5) Provide a permanent, conspicuous label that lists the operating requirements in (a)(3), (a)(4), (a)(6), and (a)(7) of this condition.
  - (6) Store waste solvent only in closed containers.
  - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) The Permittee shall ensure the following additional control equipment and operating requirements are met:
  - (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent used is insoluble in, and heavier than, water.
    - (C) A refrigerated chiller.
    - (D) Carbon adsorption.



- (E) An alternative system of demonstrated equivalent or better control as those outlined in (b)(1)(A) through (D) of this condition that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
- (3) If used, solvent spray:
  - (A) must be a solid, fluid stream; and
  - (B) shall be applied at a pressure that does not cause excessive splashing.

# D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material requirements for cold cleaner degreasers):

- (a) Material requirements specified in this section for use in cold cleaner degreasers apply as follows:
  - (1) Before January 1, 2015, in Clark, Floyd, Lake, and Porter Counties.
  - (2) On and after January 1, 2015, anywhere in the state.
- (b) Material requirements are as follows:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.
- (c) Pursuant to 326 IAC 8-3-8(c)(1), the following records shall be maintained for each sale of cold cleaner degreaser solvent:
  - (1) The name and address of the solvent supplier.
  - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
  - (3) The type of solvent purchased.
  - (4) The volume of each unit of solvent sold.
  - (5) The total volume of the solvent purchased.
  - (6) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (d) Pursuant to 326 IAC 8-3-8(c)(2), the following records shall be maintained for each purchase of cold cleaner degreaser solvent:
  - (1) The name and address of the solvent supplier.

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- (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
- (3) The type of solvent purchased.
- (4) The total volume of the solvent purchased.
- (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

# Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

# D.2.3 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.2.2(c) and D.2.2(d), the Permittee shall maintain records in accordance with Conditions D.2.2(c) and D.2.2(d).
- (b) Section C General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

#### SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

# **Emissions Unit Description:**

(a) 20.9 MMBtu/hour natural gas-fired boiler B-1

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

# New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

- E.1.1 General Provisions Relating to New Source Performance Standards under 40 CFR Part 60 [326 IAC 12-1][40 CFR Part 60, Subpart A]
  - (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A General Provisions, which are incorporated by reference as 326 IAC 12-1 for the stationary expandable polystyrene (EPS) foam food trays and cups extrusion operation, except as otherwise specified in 40 CFR Part 60, Subpart Dc.
  - (b) Pursuant to 40 CFR 60.19, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

E.1.2 New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR Part 60, Subpart Dc][326 IAC 12-1-1]

Pursuant to 40 CFR Part 60, Subpart Dc, the Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart Dc, New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60.40c, Subpart Dc) (included as Attachment A to this permit), for the stationary expandable polystyrene (EPS) foam food trays and cups extrusion operation as follows:

- (1) 40 CFR 60.40c(g)(2)
- (2) 40 CFR 60.40c(j)

The provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart Dc.

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT **OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH PART 70 OPERATING PERMIT CERTIFICATION**

Source Name: Genpak, LLC

Source Address: 845 South Elm Street, Scottsburg, Indiana 47170

Part 70 Permit No.: T143-31697-00016

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.
Please check what document is being certified:
□ Annual Compliance Certification Letter
□ Test Result (specify)
□ Report (specify)
□ Notification (specify)
□ Affidavit (specify)
□ Other (specify)
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

Scottsburg, Indiana Permit Reviewer: Donald McQuigg

Genpak, LLC

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003

Indianapolis, Indiana 46204-2251 Phone: (317) 233-0178 Fax: (317) 233-6865

# PART 70 OPERATING PERMIT EMERGENCY OCCURRENCE REPORT

Source Name: Genpak, LLC

Source Address: 845 South Elm Street, Scottsburg, Indiana 47170

Part 70 Permit No.: T143-31697-00016

# This form consists of 2 pages

Page 1 of 2

- ☐ This is an emergency as defined in 326 IAC 2-7-1(12)
  - The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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f any of the following are not applicable, mark N/A		Page 2 of 2
Date/Time Emergency started:		
Date/Time Emergency was corrected:		
Was the facility being properly operated at the time of the emergency?	Y	N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>X</sub> , CO, Pb, other	:	
Estimated amount of pollutant(s) emitted during emergency:		
Describe the steps taken to mitigate the problem:		
Describe the corrective actions/response steps taken:		
Describe the measures taken to minimize emissions:		
If applicable, describe the reasons why continued operation of the faciliti imminent injury to persons, severe damage to equipment, substantial los of product or raw materials of substantial economic value:		
Form Completed by:		
Title / Position:		
Date:		

Phone:

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH

# **Part 70 Quarterly Report**

Source Name:	Genpak, LLC
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Source Address: 845 South Elm Street, Scottsburg, Indiana 47170

Part 70 Permit No.: T143-31697-00016

Facility: Foam Cup Production Line

Parameter: Blowing Agent (Volatile Organic Compounds (VOC)) Input

Limit: Blowing agent input to the Foam Cup Production Line, shall be limited to 182

tons per twelve (12) consecutive month period, with compliance determined at

the end of each month.

QUARTER: YEAR:

	Column 1	Column 2	Column 1 + Column 2
Month	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

□ No deviation o	ccurred in this quarter.
	curred in this quarter. been reported on:
Submitted by:	
Title / Position:	
Signature:	
Date:	
Phone:	

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

# **Part 70 Quarterly Report**

Source Name:	Genpak, LLC
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Source Address: 845 South Elm Street, Scottsburg, Indiana 47170

Part 70 Permit No.: T143-31697-00016

Facility: Food Tray Production Line - Three (3) polystyrene foam extrusion operations

(EPS-1, EPS-2 and EPS-3)

Parameter: Blowing Agent (Volatile Organic Compounds (VOC)) Input

Limit: Blowing agent input to the polystyrene foam extrusion operation (EPS-1, EPS-2

and EPS-3) shall be limited to 906.66 tons per twelve (12) consecutive month

period, with compliance determined at the end of each month.

QUARTER: YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

□ No deviation o	ccurred in this quarter.
	curred in this quarter. been reported on:
Submitted by:	
Title / Position:	
Signature:	
Date:	
Phone:	

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH

# **Part 70 Quarterly Report**

Source Name: Genpak, LLC

Source Address: 845 South Elm Street, Scottsburg, Indiana 47170

Part 70 Permit No.: T143-31697-00016 Facility: Entire source

Parameter: Volatile Organic Compounds (VOC) Emissions

Limit: VOC emissions shall be limited to less than 250 tons per twelve (12) consecutive

month period, with compliance determined at the end of each month.

QUARTER: YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.	
Deviation/s occurred in this quarter. Deviation has been reported on:	
ubmitted by:	
itle / Position:	
ignature:	
ate:	
hone:	

Genpak, LLC Scottsburg, Indiana Permit Reviewer: Donald McQuigg

**Probable Cause of Deviation:** 

**Response Steps Taken:** 

Genpak, LLC

Source Name:

DRAFT

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH PART 70 OPERATING PERMIT QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Address: 845 South Elm Street, Scottsburg, Indiana 47170 Part 70 Permit No.: T143-31697-00016 Months: \_\_\_\_\_ to \_\_\_\_ Year: \_\_\_\_\_ Page 1 of 2 This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B – Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period". □ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. □ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD Permit Requirement (specify permit condition #) Date of Deviation: **Duration of Deviation: Number of Deviations: Probable Cause of Deviation:** Response Steps Taken: Permit Requirement (specify permit condition #) **Date of Deviation: Duration of Deviation: Number of Deviations:** 



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Permit Requirement (specify permit condition #)		
Date of Deviation:	Duration of Deviation:	
Number of Deviations:		
Probable Cause of Deviation:		
Response Steps Taken:		
Permit Requirement (specify permit condition #)		
Date of Deviation:	Duration of Deviation:	
Number of Deviations:		
Probable Cause of Deviation:		
Response Steps Taken:		
Permit Requirement (specify permit condition #)		
Date of Deviation:	Duration of Deviation:	
Number of Deviations:		
Probable Cause of Deviation:		
Response Steps Taken:		
Form Completed by:		
Title / Position:		
Date:		
Phone:		

# Attachment A to Part 70 Operating Permit Renewal No. T143-31697-00016

Genpak, LLC 845 South Elm Street, Scottsburg, Indiana 47170

# 40 CFR 60, Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Source: 72 FR 32759, June 13, 2007, unless otherwise noted.

# § 60.40c Applicability and delegation of authority.

- (a) Except as provided in paragraphs (d), (e), (f), and (g) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/h)) or less, but greater than or equal to 2.9 MW (10 MMBtu/h).
- (b) In delegating implementation and enforcement authority to a State under section 111(c) of the Clean Air Act, §60.48c(a)(4) shall be retained by the Administrator and not transferred to a State.
- (c) Steam generating units that meet the applicability requirements in paragraph (a) of this section are not subject to the sulfur dioxide ( $SO_2$ ) or particulate matter (PM) emission limits, performance testing requirements, or monitoring requirements under this subpart (§§60.42c, 60.43c, 60.44c, 60.45c, 60.46c, or 60.47c) during periods of combustion research, as defined in §60.41c.
- (d) Any temporary change to an existing steam generating unit for the purpose of conducting combustion research is not considered a modification under §60.14.
- (e) Affected facilities ( *i.e.* heat recovery steam generators and fuel heaters) that are associated with stationary combustion turbines and meet the applicability requirements of subpart KKKK of this part are not subject to this subpart. This subpart will continue to apply to all other heat recovery steam generators, fuel heaters, and other affected facilities that are capable of combusting more than or equal to 2.9 MW (10 MMBtu/h) heat input of fossil fuel but less than or equal to 29 MW (100 MMBtu/h) heat input of fossil fuel. If the heat recovery steam generator, fuel heater, or other affected facility is subject to this subpart, only emissions resulting from combustion of fuels in the steam generating unit are subject to this subpart. (The stationary combustion turbine emissions are subject to subpart GG or KKKK, as applicable, of this part.)
- (f) Any affected facility that meets the applicability requirements of and is subject to subpart AAAA or subpart CCCC of this part is not subject to this subpart.
- (g) Any facility that meets the applicability requirements and is subject to an EPA approved State or Federal section 111(d)/129 plan implementing subpart BBBB of this part is not subject to this subpart.
- (h) Affected facilities that also meet the applicability requirements under subpart J or subpart Ja of this part are subject to the PM and NO<sub>x</sub>standards under this subpart and the SO₂standards under subpart J or subpart Ja of this part, as applicable.
- (i) Temporary boilers are not subject to this subpart.

[72 FR 32759, June 13, 2007, as amended at 74 FR 5090, Jan. 28, 2009; 77 FR 9461, Feb. 16, 2012]

#### § 60.41c Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.

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Annual capacity factor means the ratio between the actual heat input to a steam generating unit from an individual fuel or combination of fuels during a period of 12 consecutive calendar months and the potential heat input to the steam generating unit from all fuels had the steam generating unit been operated for 8,760 hours during that 12-month period at the maximum design heat input capacity. In the case of steam generating units that are rented or leased, the actual heat input shall be determined based on the combined heat input from all operations of the affected facility during a period of 12 consecutive calendar months.

Coal means all solid fuels classified as anthracite, bituminous, subbituminous, or lignite by the American Society of Testing and Materials in ASTM D388 (incorporated by reference, see §60.17), coal refuse, and petroleum coke. Coalderived synthetic fuels derived from coal for the purposes of creating useful heat, including but not limited to solvent refined coal, gasified coal not meeting the definition of natural gas, coal-oil mixtures, and coal-water mixtures, are also included in this definition for the purposes of this subpart.

Coal refuse means any by-product of coal mining or coal cleaning operations with an ash content greater than 50 percent (by weight) and a heating value less than 13,900 kilojoules per kilogram (kJ/kg) (6,000 Btu per pound (Btu/lb) on a dry basis.

Combined cycle system means a system in which a separate source (such as a stationary gas turbine, internal combustion engine, or kiln) provides exhaust gas to a steam generating unit.

Combustion research means the experimental firing of any fuel or combination of fuels in a steam generating unit for the purpose of conducting research and development of more efficient combustion or more effective prevention or control of air pollutant emissions from combustion, provided that, during these periods of research and development, the heat generated is not used for any purpose other than preheating combustion air for use by that steam generating unit ( i.e. , the heat generated is released to the atmosphere without being used for space heating, process heating, driving pumps, preheating combustion air for other units, generating electricity, or any other purpose).

Conventional technology means wet flue gas desulfurization technology, dry flue gas desulfurization technology, atmospheric fluidized bed combustion technology, and oil hydrodesulfurization technology.

Distillate oil means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396 (incorporated by reference, see §60.17), diesel fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D975 (incorporated by reference, see §60.17), kerosine, as defined by the American Society of Testing and Materials in ASTM D3699 (incorporated by reference, see §60.17), biodiesel as defined by the American Society of Testing and Materials in ASTM D6751 (incorporated by reference, see §60.17), or biodiesel blends as defined by the American Society of Testing and Materials in ASTM D7467 (incorporated by reference, see §60.17).

Dry flue gas desulfurization technology means a SO<sub>2</sub>control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline reagent and water, whether introduced separately or as a premixed slurry or solution and forming a dry powder material. This definition includes devices where the dry powder material is subsequently converted to another form. Alkaline reagents used in dry flue gas desulfurization systems include, but are not limited to, lime and sodium compounds.

Duct burner means a device that combusts fuel and that is placed in the exhaust duct from another source (such as a stationary gas turbine, internal combustion engine, kiln, etc.) to allow the firing of additional fuel to heat the exhaust gases before the exhaust gases enter a steam generating unit.

Emerging technology means any SO<sub>2</sub>control system that is not defined as a conventional technology under this section, and for which the owner or operator of the affected facility has received approval from the Administrator to operate as an emerging technology under §60.48c(a)(4).

Federally enforceable means all limitations and conditions that are enforceable by the Administrator, including the requirements of 40 CFR parts 60 and 61, requirements within any applicable State implementation plan, and any permit requirements established under 40 CFR 52.21 or under 40 CFR 51.18 and 51.24.

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Fluidized bed combustion technology means a device wherein fuel is distributed onto a bed (or series of beds) of limestone aggregate (or other sorbent materials) for combustion; and these materials are forced upward in the device by the flow of combustion air and the gaseous products of combustion. Fluidized bed combustion technology includes, but is not limited to, bubbling bed units and circulating bed units.

Fuel pretreatment means a process that removes a portion of the sulfur in a fuel before combustion of the fuel in a steam generating unit.

Heat input means heat derived from combustion of fuel in a steam generating unit and does not include the heat derived from preheated combustion air, recirculated flue gases, or exhaust gases from other sources (such as stationary gas turbines, internal combustion engines, and kilns).

Heat transfer medium means any material that is used to transfer heat from one point to another point.

Maximum design heat input capacity means the ability of a steam generating unit to combust a stated maximum amount of fuel (or combination of fuels) on a steady state basis as determined by the physical design and characteristics of the steam generating unit.

#### Natural gas means:

- (1) A naturally occurring mixture of hydrocarbon and nonhydrocarbon gases found in geologic formations beneath the earth's surface, of which the principal constituent is methane; or
- (2) Liquefied petroleum (LP) gas, as defined by the American Society for Testing and Materials in ASTM D1835 (incorporated by reference, see §60.17); or
- (3) A mixture of hydrocarbons that maintains a gaseous state at ISO conditions. Additionally, natural gas must either be composed of at least 70 percent methane by volume or have a gross calorific value between 34 and 43 megajoules (MJ) per dry standard cubic meter (910 and 1,150 Btu per dry standard cubic foot).

Noncontinental area means the State of Hawaii, the Virgin Islands, Guam, American Samoa, the Commonwealth of Puerto Rico, or the Northern Mariana Islands.

Oil means crude oil or petroleum, or a liquid fuel derived from crude oil or petroleum, including distillate oil and residual oil.

Potential sulfur dioxide emission rate means the theoretical SO<sub>2</sub>emissions (nanograms per joule (ng/J) or lb/MMBtu heat input) that would result from combusting fuel in an uncleaned state and without using emission control systems.

*Process heater* means a device that is primarily used to heat a material to initiate or promote a chemical reaction in which the material participates as a reactant or catalyst.

Residual oil means crude oil, fuel oil that does not comply with the specifications under the definition of distillate oil, and all fuel oil numbers 4, 5, and 6, as defined by the American Society for Testing and Materials in ASTM D396 (incorporated by reference, see §60.17).

Steam generating unit means a device that combusts any fuel and produces steam or heats water or heats any heat transfer medium. This term includes any duct burner that combusts fuel and is part of a combined cycle system. This term does not include process heaters as defined in this subpart.

Steam generating unit operating day means a 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time in the steam generating unit. It is not necessary for fuel to be combusted continuously for the entire 24-hour period.

Temporary boiler means a steam generating unit that combusts natural gas or distillate oil with a potential SO<sub>2</sub>emissions rate no greater than 26 ng/J (0.060 lb/MMBtu), and the unit is designed to, and is capable of, being

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carried or moved from one location to another by means of, for example, wheels, skids, carrying handles, dollies, trailers, or platforms. A steam generating unit is not a temporary boiler if any one of the following conditions exists:

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- (1) The equipment is attached to a foundation.
- (2) The steam generating unit or a replacement remains at a location for more than 180 consecutive days. Any temporary boiler that replaces a temporary boiler at a location and performs the same or similar function will be included in calculating the consecutive time period.
- (3) The equipment is located at a seasonal facility and operates during the full annual operating period of the seasonal facility, remains at the facility for at least 2 years, and operates at that facility for at least 3 months each year.
- (4) The equipment is moved from one location to another in an attempt to circumvent the residence time requirements of this definition.

Wet flue gas desulfurization technology means an SO<sub>2</sub>control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline slurry or solution and forming a liquid material. This definition includes devices where the liquid material is subsequently converted to another form. Alkaline reagents used in wet flue gas desulfurization systems include, but are not limited to, lime, limestone, and sodium compounds.

Wet scrubber system means any emission control device that mixes an aqueous stream or slurry with the exhaust gases from a steam generating unit to control emissions of PM or SO<sub>2</sub>.

Wood means wood, wood residue, bark, or any derivative fuel or residue thereof, in any form, including but not limited to sawdust, sanderdust, wood chips, scraps, slabs, millings, shavings, and processed pellets made from wood or other forest residues.

[72 FR 32759, June 13, 2007, as amended at 74 FR 5090, Jan. 28, 2009; 77 FR 9461, Feb. 16, 2012]

# § 60.42c Standard for sulfur dioxide (SO2).

- (a) Except as provided in paragraphs (b), (c), and (e) of this section, on and after the date on which the performance test is completed or required to be completed under §60.8, whichever date comes first, the owner or operator of an affected facility that combusts only coal shall neither: cause to be discharged into the atmosphere from the affected facility any gases that contain SO<sub>2</sub>in excess of 87 ng/J (0.20 lb/MMBtu) heat input or 10 percent (0.10) of the potential SO<sub>2</sub>emission rate (90 percent reduction), nor cause to be discharged into the atmosphere from the affected facility any gases that contain SO<sub>2</sub>in excess of 520 ng/J (1.2 lb/MMBtu) heat input. If coal is combusted with other fuels, the affected facility shall neither: cause to be discharged into the atmosphere from the affected facility any gases that contain SO<sub>2</sub>in excess of 87 ng/J (0.20 lb/MMBtu) heat input or 10 percent (0.10) of the potential SO<sub>2</sub>emission rate (90 percent reduction), nor cause to be discharged into the atmosphere from the affected facility any gases that contain SO<sub>2</sub>in excess of the emission limit is determined pursuant to paragraph (e)(2) of this section.
- (b) Except as provided in paragraphs (c) and (e) of this section, on and after the date on which the performance test is completed or required to be completed under §60.8, whichever date comes first, the owner or operator of an affected facility that:
- (1) Combusts only coal refuse alone in a fluidized bed combustion steam generating unit shall neither:
- (i) Cause to be discharged into the atmosphere from that affected facility any gases that contain SO<sub>2</sub>in excess of 87 ng/J (0.20 lb/MMBtu) heat input or 20 percent (0.20) of the potential SO<sub>2</sub>emission rate (80 percent reduction); nor
- (ii) Cause to be discharged into the atmosphere from that affected facility any gases that contain SO<sub>2</sub>in excess of SO<sub>2</sub>in excess of 520 ng/J (1.2 lb/MMBtu) heat input. If coal is fired with coal refuse, the affected facility subject to paragraph (a) of this section. If oil or any other fuel (except coal) is fired with coal refuse, the affected facility is

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subject to the 87 ng/J (0.20 lb/MMBtu) heat input SO<sub>2</sub>emissions limit or the 90 percent SO<sub>2</sub>reduction requirement specified in paragraph (a) of this section and the emission limit is determined pursuant to paragraph (e)(2) of this section.

- (2) Combusts only coal and that uses an emerging technology for the control of SO₂emissions shall neither:
- (i) Cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂in excess of 50 percent (0.50) of the potential SO₂emission rate (50 percent reduction); nor
- (ii) Cause to be discharged into the atmosphere from that affected facility any gases that contain  $SO_2$ in excess of 260 ng/J (0.60 lb/MMBtu) heat input. If coal is combusted with other fuels, the affected facility is subject to the 50 percent  $SO_2$ reduction requirement specified in this paragraph and the emission limit determined pursuant to paragraph (e)(2) of this section.
- (c) On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that combusts coal, alone or in combination with any other fuel, and is listed in paragraphs (c)(1), (2), (3), or (4) of this section shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO<sub>2</sub>in excess of the emission limit determined pursuant to paragraph (e)(2) of this section. Percent reduction requirements are not applicable to affected facilities under paragraphs (c)(1), (2), (3), or (4).
- (1) Affected facilities that have a heat input capacity of 22 MW (75 MMBtu/h) or less;
- (2) Affected facilities that have an annual capacity for coal of 55 percent (0.55) or less and are subject to a federally enforceable requirement limiting operation of the affected facility to an annual capacity factor for coal of 55 percent (0.55) or less.
- (3) Affected facilities located in a noncontinental area; or
- (4) Affected facilities that combust coal in a duct burner as part of a combined cycle system where 30 percent (0.30) or less of the heat entering the steam generating unit is from combustion of coal in the duct burner and 70 percent (0.70) or more of the heat entering the steam generating unit is from exhaust gases entering the duct burner.
- (d) On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂in excess of 215 ng/J (0.50 lb/MMBtu) heat input from oil; or, as an alternative, no owner or operator of an affected facility that combusts oil shall combust oil in the affected facility that contains greater than 0.5 weight percent sulfur. The percent reduction requirements are not applicable to affected facilities under this paragraph.
- (e) On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that combusts coal, oil, or coal and oil with any other fuel shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂in excess of the following:
- (1) The percent of potential SO<sub>2</sub>emission rate or numerical SO<sub>2</sub>emission rate required under paragraph (a) or (b)(2) of this section, as applicable, for any affected facility that
- (i) Combusts coal in combination with any other fuel;
- (ii) Has a heat input capacity greater than 22 MW (75 MMBtu/h); and
- (iii) Has an annual capacity factor for coal greater than 55 percent (0.55); and
- (2) The emission limit determined according to the following formula for any affected facility that combusts coal, oil, or coal and oil with any other fuel:

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$$E_{e} = \frac{\left(K_{a}H_{a} + K_{b}H_{b} + K_{c}H_{c}\right)}{\left(H_{a} + H_{b} + H_{c}\right)}$$

Where:

E<sub>s</sub>= SO<sub>2</sub>emission limit, expressed in ng/J or lb/MMBtu heat input;

 $K_a = 520 \text{ ng/J } (1.2 \text{ lb/MMBtu});$ 

 $K_b = 260 \text{ ng/J } (0.60 \text{ lb/MMBtu});$ 

 $K_c = 215 \text{ ng/J } (0.50 \text{ lb/MMBtu});$ 

H<sub>a</sub>= Heat input from the combustion of coal, except coal combusted in an affected facility subject to paragraph (b)(2) of this section, in Joules (J) [MMBtu];

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H<sub>n</sub>= Heat input from the combustion of coal in an affected facility subject to paragraph (b)(2) of this section, in J (MMBtu); and

H<sub>c</sub>= Heat input from the combustion of oil, in J (MMBtu).

- (f) Reduction in the potential SO<sub>2</sub>emission rate through fuel pretreatment is not credited toward the percent reduction requirement under paragraph (b)(2) of this section unless:
- (1) Fuel pretreatment results in a 50 percent (0.50) or greater reduction in the potential SO<sub>2</sub>emission rate; and
- (2) Emissions from the pretreated fuel (without either combustion or post-combustion SO<sub>2</sub>control) are equal to or less than the emission limits specified under paragraph (b)(2) of this section.
- (g) Except as provided in paragraph (h) of this section, compliance with the percent reduction requirements, fuel oil sulfur limits, and emission limits of this section shall be determined on a 30-day rolling average basis.
- (h) For affected facilities listed under paragraphs (h)(1), (2), (3), or (4) of this section, compliance with the emission limits or fuel oil sulfur limits under this section may be determined based on a certification from the fuel supplier, as described under §60.48c(f), as applicable.
- (1) Distillate oil-fired affected facilities with heat input capacities between 2.9 and 29 MW (10 and 100 MMBtu/hr).
- (2) Residual oil-fired affected facilities with heat input capacities between 2.9 and 8.7 MW (10 and 30 MMBtu/hr).
- (3) Coal-fired affected facilities with heat input capacities between 2.9 and 8.7 MW (10 and 30 MMBtu/h).
- (4) Other fuels-fired affected facilities with heat input capacities between 2.9 and 8.7 MW (10 and 30 MMBtu/h).
- (i) The SO<sub>2</sub> emission limits, fuel oil sulfur limits, and percent reduction requirements under this section apply at all times, including periods of startup, shutdown, and malfunction.
- (j) For affected facilities located in noncontinental areas and affected facilities complying with the percent reduction standard, only the heat input supplied to the affected facility from the combustion of coal and oil is counted under this section. No credit is provided for the heat input to the affected facility from wood or other fuels or for heat derived from exhaust gases from other sources, such as stationary gas turbines, internal combustion engines, and kilns.

[72 FR 32759, June 13, 2007, as amended at 74 FR 5090, Jan. 28, 2009; 77 FR 9462, Feb. 16, 2012]

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# § 60.43c Standard for particulate matter (PM).

- (a) On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that commenced construction, reconstruction, or modification on or before February 28, 2005, that combusts coal or combusts mixtures of coal with other fuels and has a heat input capacity of 8.7 MW (30 MMBtu/h) or greater, shall cause to be discharged into the atmosphere from that affected facility any gases that contain PM in excess of the following emission limits:
- (1) 22 ng/J (0.051 lb/MMBtu) heat input if the affected facility combusts only coal, or combusts coal with other fuels and has an annual capacity factor for the other fuels of 10 percent (0.10) or less.
- (2) 43 ng/J (0.10 lb/MMBtu) heat input if the affected facility combusts coal with other fuels, has an annual capacity factor for the other fuels greater than 10 percent (0.10), and is subject to a federally enforceable requirement limiting operation of the affected facility to an annual capacity factor greater than 10 percent (0.10) for fuels other than coal.
- (b) On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that commenced construction, reconstruction, or modification on or before February 28, 2005, that combusts wood or combusts mixtures of wood with other fuels (except coal) and has a heat input capacity of 8.7 MW (30 MMBtu/h) or greater, shall cause to be discharged into the atmosphere from that affected facility any gases that contain PM in excess of the following emissions limits:
- (1) 43 ng/J (0.10 lb/MMBtu) heat input if the affected facility has an annual capacity factor for wood greater than 30 percent (0.30); or
- (2) 130 ng/J (0.30 lb/MMBtu) heat input if the affected facility has an annual capacity factor for wood of 30 percent (0.30) or less and is subject to a federally enforceable requirement limiting operation of the affected facility to an annual capacity factor for wood of 30 percent (0.30) or less.
- (c) On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that combusts coal, wood, or oil and has a heat input capacity of 8.7 MW (30 MMBtu/h) or greater shall cause to be discharged into the atmosphere from that affected facility any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. Owners and operators of an affected facility that elect to install, calibrate, maintain, and operate a continuous emissions monitoring system (CEMS) for measuring PM emissions according to the requirements of this subpart and are subject to a federally enforceable PM limit of 0.030 lb/MMBtu or less are exempt from the opacity standard specified in this paragraph (c).
- (d) The PM and opacity standards under this section apply at all times, except during periods of startup, shutdown, or malfunction.
- (e)(1) On and after the date on which the initial performance test is completed or is required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that commences construction, reconstruction, or modification after February 28, 2005, and that combusts coal, oil, wood, a mixture of these fuels, or a mixture of these fuels with any other fuels and has a heat input capacity of 8.7 MW (30 MMBtu/h) or greater shall cause to be discharged into the atmosphere from that affected facility any gases that contain PM in excess of 13 ng/J (0.030 lb/MMBtu) heat input, except as provided in paragraphs (e)(2), (e)(3), and (e)(4) of this section.
- (2) As an alternative to meeting the requirements of paragraph (e)(1) of this section, the owner or operator of an affected facility for which modification commenced after February 28, 2005, may elect to meet the requirements of this paragraph. On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that commences modification after February 28, 2005 shall cause to be discharged into the atmosphere from that affected facility any gases that contain PM in excess of both:
- (i) 22 ng/J (0.051 lb/MMBtu) heat input derived from the combustion of coal, oil, wood, a mixture of these fuels, or a mixture of these fuels with any other fuels; and

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- (ii) 0.2 percent of the combustion concentration (99.8 percent reduction) when combusting coal, oil, wood, a mixture of these fuels, or a mixture of these fuels with any other fuels.
- (3) On and after the date on which the initial performance test is completed or is required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that commences modification after February 28, 2005, and that combusts over 30 percent wood (by heat input) on an annual basis and has a heat input capacity of 8.7 MW (30 MMBtu/h) or greater shall cause to be discharged into the atmosphere from that affected facility any gases that contain PM in excess of 43 ng/J (0.10 lb/MMBtu) heat input.
- (4) An owner or operator of an affected facility that commences construction, reconstruction, or modification after February 28, 2005, and that combusts only oil that contains no more than 0.50 weight percent sulfur or a mixture of 0.50 weight percent sulfur oil with other fuels not subject to a PM standard under §60.43c and not using a post-combustion technology (except a wet scrubber) to reduce PM or SO₂emissions is not subject to the PM limit in this section.

[72 FR 32759, June 13, 2007, as amended at 74 FR 5091, Jan. 28, 2009; 77 FR 9462, Feb. 16, 2012]

# § 60.44c Compliance and performance test methods and procedures for sulfur dioxide.

- (a) Except as provided in paragraphs (g) and (h) of this section and §60.8(b), performance tests required under §60.8 shall be conducted following the procedures specified in paragraphs (b), (c), (d), (e), and (f) of this section, as applicable. Section 60.8(f) does not apply to this section. The 30-day notice required in §60.8(d) applies only to the initial performance test unless otherwise specified by the Administrator.
- (b) The initial performance test required under §60.8 shall be conducted over 30 consecutive operating days of the steam generating unit. Compliance with the percent reduction requirements and SO₂emission limits under §60.42c shall be determined using a 30-day average. The first operating day included in the initial performance test shall be scheduled within 30 days after achieving the maximum production rate at which the affect facility will be operated, but not later than 180 days after the initial startup of the facility. The steam generating unit load during the 30-day period does not have to be the maximum design heat input capacity, but must be representative of future operating conditions.
- (c) After the initial performance test required under paragraph (b) of this section and §60.8, compliance with the percent reduction requirements and SO<sub>2</sub>emission limits under §60.42c is based on the average percent reduction and the average SO<sub>2</sub>emission rates for 30 consecutive steam generating unit operating days. A separate performance test is completed at the end of each steam generating unit operating day, and a new 30-day average percent reduction and SO<sub>2</sub>emission rate are calculated to show compliance with the standard.
- (d) If only coal, only oil, or a mixture of coal and oil is combusted in an affected facility, the procedures in Method 19 of appendix A of this part are used to determine the hourly  $SO_2$ emission rate ( $E_{ho}$ ) and the 30-day average  $SO_2$ emission rate ( $E_{ao}$ ). The hourly averages used to compute the 30-day averages are obtained from the CEMS. Method 19 of appendix A of this part shall be used to calculate  $E_{ao}$ when using daily fuel sampling or Method 6B of appendix A of this part.
- (e) If coal, oil, or coal and oil are combusted with other fuels:
- (1) An adjusted  $E_{ho}(E_{ho}o)$  is used in Equation 19–19 of Method 19 of appendix A of this part to compute the adjusted  $E_{ao}(E_{ao}o)$ . The  $E_{ho}o$  is computed using the following formula:

$$E_{bo} \circ = \frac{E_{bo} - E_{w}(1 - X_{b})}{X_{b}}$$

Where:

 $E_{ho}o = Adjusted E_{ho}, ng/J (lb/MMBtu);$ 

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E<sub>ho</sub>= Hourly SO<sub>2</sub>emission rate, ng/J (lb/MMBtu);

 $E_w=SO_2$ concentration in fuels other than coal and oil combusted in the affected facility, as determined by fuel sampling and analysis procedures in Method 9 of appendix A of this part, ng/J (lb/MMBtu). The value  $E_w$ for each fuel lot is used for each hourly average during the time that the lot is being combusted. The owner or operator does not have to measure  $E_w$ if the owner or operator elects to assume  $E_w=0$ .

 $X_k$ = Fraction of the total heat input from fuel combustion derived from coal and oil, as determined by applicable procedures in Method 19 of appendix A of this part.

- (2) The owner or operator of an affected facility that qualifies under the provisions of  $\S60.42c(c)$  or (d) (where percent reduction is not required) does not have to measure the parameters  $E_w$  or  $X_k$  if the owner or operator of the affected facility elects to measure emission rates of the coal or oil using the fuel sampling and analysis procedures under Method 19 of appendix A of this part.
- (f) Affected facilities subject to the percent reduction requirements under §60.42c(a) or (b) shall determine compliance with the SO₂emission limits under §60.42c pursuant to paragraphs (d) or (e) of this section, and shall determine compliance with the percent reduction requirements using the following procedures:
- (1) If only coal is combusted, the percent of potential SO₂emission rate is computed using the following formula:

$$%P_{s} = 100 \left( 1 - \frac{\%R_{g}}{100} \right) \left( 1 - \frac{\%R_{f}}{100} \right)$$

Where:

%P<sub>s</sub>= Potential SO<sub>2</sub>emission rate, in percent;

%R<sub>g</sub>= SO<sub>2</sub>removal efficiency of the control device as determined by Method 19 of appendix A of this part, in percent; and

%R<sub>f</sub>= SO₂removal efficiency of fuel pretreatment as determined by Method 19 of appendix A of this part, in percent.

- (2) If coal, oil, or coal and oil are combusted with other fuels, the same procedures required in paragraph (f)(1) of this section are used, except as provided for in the following:
- (i) To compute the  $%P_s$ , an adjusted  $%R_g(%R_go)$  is computed from  $E_{ao}$  o from paragraph (e)(1) of this section and an adjusted average  $SO_2$  inlet rate ( $E_{ai}o$ ) using the following formula:

$$\%R_{g0} = 100 \left( 1 - \frac{E_{\infty}^{\circ}}{E_{\infty}^{\circ}} \right)$$

Where:

 $R_q$ o = Adjusted  $R_q$ , in percent;

E<sub>ao</sub>o = Adjusted E<sub>ao</sub>, ng/J (lb/MMBtu); and

E<sub>ai</sub>o = Adjusted average SO<sub>2</sub>inlet rate, ng/J (lb/MMBtu).

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(ii) To compute Eaio, an adjusted hourly SO2inlet rate (Ehio) is used. The Ehio is computed using the following formula:

$$E_{\mathbf{h}} \circ = \frac{E_{\mathbf{h}} - E_{\mathbf{w}} (1 - X_{\mathbf{h}})}{X_{\mathbf{h}}}$$

Where:

 $E_{hi}o = Adjusted E_{hi}, ng/J (lb/MMBtu);$ 

E<sub>hi</sub>= Hourly SO<sub>2</sub>inlet rate, ng/J (lb/MMBtu);

 $E_w = SO_2$ concentration in fuels other than coal and oil combusted in the affected facility, as determined by fuel sampling and analysis procedures in Method 19 of appendix A of this part, ng/J (lb/MMBtu). The value  $E_w$  for each fuel lot is used for each hourly average during the time that the lot is being combusted. The owner or operator does not have to measure  $E_w$  if the owner or operator elects to assume  $E_w = 0$ ; and

 $X_k$ = Fraction of the total heat input from fuel combustion derived from coal and oil, as determined by applicable procedures in Method 19 of appendix A of this part.

- (g) For oil-fired affected facilities where the owner or operator seeks to demonstrate compliance with the fuel oil sulfur limits under §60.42c based on shipment fuel sampling, the initial performance test shall consist of sampling and analyzing the oil in the initial tank of oil to be fired in the steam generating unit to demonstrate that the oil contains 0.5 weight percent sulfur or less. Thereafter, the owner or operator of the affected facility shall sample the oil in the fuel tank after each new shipment of oil is received, as described under §60.46c(d)(2).
- (h) For affected facilities subject to §60.42c(h)(1), (2), or (3) where the owner or operator seeks to demonstrate compliance with the SO₂standards based on fuel supplier certification, the performance test shall consist of the certification from the fuel supplier, as described in §60.48c(f), as applicable.
- (i) The owner or operator of an affected facility seeking to demonstrate compliance with the  $SO_2$ standards under  $\S60.42c(c)(2)$  shall demonstrate the maximum design heat input capacity of the steam generating unit by operating the steam generating unit at this capacity for 24 hours. This demonstration shall be made during the initial performance test, and a subsequent demonstration may be requested at any other time. If the demonstrated 24-hour average firing rate for the affected facility is less than the maximum design heat input capacity stated by the manufacturer of the affected facility, the demonstrated 24-hour average firing rate shall be used to determine the annual capacity factor for the affected facility; otherwise, the maximum design heat input capacity provided by the manufacturer shall be used.
- (j) The owner or operator of an affected facility shall use all valid  $SO_2$ emissions data in calculating  $%P_s$ and  $E_{ho}$ under paragraphs (d), (e), or (f) of this section, as applicable, whether or not the minimum emissions data requirements under  $\S60.46c(f)$  are achieved. All valid emissions data, including valid data collected during periods of startup, shutdown, and malfunction, shall be used in calculating  $%P_s$ or  $E_{ho}$ pursuant to paragraphs (d), (e), or (f) of this section, as applicable.

[72 FR 32759, June 13, 2007, as amended at 74 FR 5091, Jan. 28, 2009]

# § 60.45c Compliance and performance test methods and procedures for particulate matter.

- (a) The owner or operator of an affected facility subject to the PM and/or opacity standards under §60.43c shall conduct an initial performance test as required under §60.8, and shall conduct subsequent performance tests as requested by the Administrator, to determine compliance with the standards using the following procedures and reference methods, except as specified in paragraph (c) of this section.
- (1) Method 1 of appendix A of this part shall be used to select the sampling site and the number of traverse sampling points.

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- (2) Method 3A or 3B of appendix A–2 of this part shall be used for gas analysis when applying Method 5 or 5B of appendix A–3 of this part or 17 of appendix A–6 of this part.
- (3) Method 5, 5B, or 17 of appendix A of this part shall be used to measure the concentration of PM as follows:
- (i) Method 5 of appendix A of this part may be used only at affected facilities without wet scrubber systems.
- (ii) Method 17 of appendix A of this part may be used at affected facilities with or without wet scrubber systems provided the stack gas temperature does not exceed a temperature of 160 °C (320 °F). The procedures of Sections 8.1 and 11.1 of Method 5B of appendix A of this part may be used in Method 17 of appendix A of this part only if Method 17 of appendix A of this part is used in conjunction with a wet scrubber system. Method 17 of appendix A of this part shall not be used in conjunction with a wet scrubber system if the effluent is saturated or laden with water droplets.
- (iii) Method 5B of appendix A of this part may be used in conjunction with a wet scrubber system.
- (4) The sampling time for each run shall be at least 120 minutes and the minimum sampling volume shall be 1.7 dry standard cubic meters (dscm) [60 dry standard cubic feet (dscf)] except that smaller sampling times or volumes may be approved by the Administrator when necessitated by process variables or other factors.
- (5) For Method 5 or 5B of appendix A of this part, the temperature of the sample gas in the probe and filter holder shall be monitored and maintained at 160 ±14 °C (320±25 °F).
- (6) For determination of PM emissions, an oxygen  $(O_2)$  or carbon dioxide  $(CO_2)$  measurement shall be obtained simultaneously with each run of Method 5, 5B, or 17 of appendix A of this part by traversing the duct at the same sampling location.
- (7) For each run using Method 5, 5B, or 17 of appendix A of this part, the emission rates expressed in ng/J (lb/MMBtu) heat input shall be determined using:
- (i) The O<sub>2</sub>or CO<sub>2</sub>measurements and PM measurements obtained under this section, (ii) The dry basis F factor, and
- (iii) The dry basis emission rate calculation procedure contained in Method 19 of appendix A of this part.
- (8) Method 9 of appendix A-4 of this part shall be used for determining the opacity of stack emissions.
- (b) The owner or operator of an affected facility seeking to demonstrate compliance with the PM standards under §60.43c(b)(2) shall demonstrate the maximum design heat input capacity of the steam generating unit by operating the steam generating unit at this capacity for 24 hours. This demonstration shall be made during the initial performance test, and a subsequent demonstration may be requested at any other time. If the demonstrated 24-hour average firing rate for the affected facility is less than the maximum design heat input capacity stated by the manufacturer of the affected facility, the demonstrated 24-hour average firing rate shall be used to determine the annual capacity factor for the affected facility; otherwise, the maximum design heat input capacity provided by the manufacturer shall be used.
- (c) In place of PM testing with Method 5 or 5B of appendix A–3 of this part or Method 17 of appendix A–6 of this part, an owner or operator may elect to install, calibrate, maintain, and operate a CEMS for monitoring PM emissions discharged to the atmosphere and record the output of the system. The owner or operator of an affected facility who elects to continuously monitor PM emissions instead of conducting performance testing using Method 5 or 5B of appendix A–3 of this part or Method 17 of appendix A–6 of this part shall install, calibrate, maintain, and operate a CEMS and shall comply with the requirements specified in paragraphs (c)(1) through (c)(14) of this section.
- (1) Notify the Administrator 1 month before starting use of the system.
- (2) Notify the Administrator 1 month before stopping use of the system.

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(3) The monitor shall be installed, evaluated, and operated in accordance with §60.13 of subpart A of this part.

- (4) The initial performance evaluation shall be completed no later than 180 days after the date of initial startup of the affected facility, as specified under §60.8 of subpart A of this part or within 180 days of notification to the Administrator of use of CEMS if the owner or operator was previously determining compliance by Method 5, 5B, or 17 of appendix A of this part performance tests, whichever is later.
- (5) The owner or operator of an affected facility shall conduct an initial performance test for PM emissions as required under §60.8 of subpart A of this part. Compliance with the PM emission limit shall be determined by using the CEMS specified in paragraph (d) of this section to measure PM and calculating a 24-hour block arithmetic average emission concentration using EPA Reference Method 19 of appendix A of this part, section 4.1.
- (6) Compliance with the PM emission limit shall be determined based on the 24-hour daily (block) average of the hourly arithmetic average emission concentrations using CEMS outlet data.
- (7) At a minimum, valid CEMS hourly averages shall be obtained as specified in paragraph (c)(7)(i) of this section for 75 percent of the total operating hours per 30-day rolling average.
- (i) At least two data points per hour shall be used to calculate each 1-hour arithmetic average.
- (ii) [Reserved]
- (8) The 1-hour arithmetic averages required under paragraph (c)(7) of this section shall be expressed in ng/J or lb/MMBtu heat input and shall be used to calculate the boiler operating day daily arithmetic average emission concentrations. The 1-hour arithmetic averages shall be calculated using the data points required under §60.13(e)(2) of subpart A of this part.
- (9) All valid CEMS data shall be used in calculating average emission concentrations even if the minimum CEMS data requirements of paragraph (c)(7) of this section are not met.
- (10) The CEMS shall be operated according to Performance Specification 11 in appendix B of this part.
- (11) During the correlation testing runs of the CEMS required by Performance Specification 11 in appendix B of this part, PM and O<sub>2</sub>(or CO<sub>2</sub>) data shall be collected concurrently (or within a 30- to 60-minute period) by both the continuous emission monitors and performance tests conducted using the following test methods.
- (i) For PM, Method 5 or 5B of appendix A-3 of this part or Method 17 of appendix A-6 of this part shall be used; and
- (ii) For O2 (or CO<sub>2</sub>), Method 3A or 3B of appendix A–2 of this part, as applicable shall be used.
- (12) Quarterly accuracy determinations and daily calibration drift tests shall be performed in accordance with procedure 2 in appendix F of this part. Relative Response Audit's must be performed annually and Response Correlation Audits must be performed every 3 years.
- (13) When PM emissions data are not obtained because of CEMS breakdowns, repairs, calibration checks, and zero and span adjustments, emissions data shall be obtained by using other monitoring systems as approved by the Administrator or EPA Reference Method 19 of appendix A of this part to provide, as necessary, valid emissions data for a minimum of 75 percent of total operating hours on a 30-day rolling average.
- (14) As of January 1, 2012, and within 90 days after the date of completing each performance test, as defined in §60.8, conducted to demonstrate compliance with this subpart, you must submit relative accuracy test audit ( *i.e.*, reference method) data and performance test ( *i.e.*, compliance test) data, except opacity data, electronically to EPA's Central Data Exchange (CDX) by using the Electronic Reporting Tool (ERT) (see <a href="http://www.epa.gov/ttn/chief/ert/ert">http://www.epa.gov/ttn/chief/ert/ert</a> tool.html/) or other compatible electronic spreadsheet. Only data collected using test methods compatible with ERT are subject to this requirement to be submitted electronically into EPA's WebFIRE database.

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(d) The owner or operator of an affected facility seeking to demonstrate compliance under §60.43c(e)(4) shall follow the applicable procedures under §60.48c(f). For residual oil-fired affected facilities, fuel supplier certifications are only allowed for facilities with heat input capacities between 2.9 and 8.7 MW (10 to 30 MMBtu/h).

[72 FR 32759, June 13, 2007, as amended at 74 FR 5091, Jan. 28, 2009; 76 FR 3523, Jan. 20, 2011; 77 FR 9463, Feb. 16, 2012]

#### § 60.46c Emission monitoring for sulfur dioxide.

- (a) Except as provided in paragraphs (d) and (e) of this section, the owner or operator of an affected facility subject to the SO<sub>2</sub>emission limits under §60.42c shall install, calibrate, maintain, and operate a CEMS for measuring SO<sub>2</sub>concentrations and either O<sub>2</sub>or CO<sub>2</sub>concentrations at the outlet of the SO<sub>2</sub>control device (or the outlet of the steam generating unit if no SO<sub>2</sub>control device is used), and shall record the output of the system. The owner or operator of an affected facility subject to the percent reduction requirements under §60.42c shall measure SO<sub>2</sub>concentrations and either O<sub>2</sub>or CO<sub>2</sub>concentrations at both the inlet and outlet of the SO<sub>2</sub>control device.
- (b) The 1-hour average SO<sub>2</sub>emission rates measured by a CEMS shall be expressed in ng/J or lb/MMBtu heat input and shall be used to calculate the average emission rates under §60.42c. Each 1-hour average SO<sub>2</sub>emission rate must be based on at least 30 minutes of operation, and shall be calculated using the data points required under §60.13(h)(2). Hourly SO<sub>2</sub>emission rates are not calculated if the affected facility is operated less than 30 minutes in a 1-hour period and are not counted toward determination of a steam generating unit operating day.
- (c) The procedures under §60.13 shall be followed for installation, evaluation, and operation of the CEMS.
- (1) All CEMS shall be operated in accordance with the applicable procedures under Performance Specifications 1, 2, and 3 of appendix B of this part.
- (2) Quarterly accuracy determinations and daily calibration drift tests shall be performed in accordance with Procedure 1 of appendix F of this part.
- (3) For affected facilities subject to the percent reduction requirements under §60.42c, the span value of the SO<sub>2</sub>CEMS at the inlet to the SO<sub>2</sub>control device shall be 125 percent of the maximum estimated hourly potential SO<sub>2</sub>emission rate of the fuel combusted, and the span value of the SO<sub>2</sub>CEMS at the outlet from the SO<sub>2</sub>control device shall be 50 percent of the maximum estimated hourly potential SO<sub>2</sub>emission rate of the fuel combusted.
- (4) For affected facilities that are not subject to the percent reduction requirements of §60.42c, the span value of the SO<sub>2</sub>CEMS at the outlet from the SO<sub>2</sub>control device (or outlet of the steam generating unit if no SO<sub>2</sub>control device is used) shall be 125 percent of the maximum estimated hourly potential SO<sub>2</sub>emission rate of the fuel combusted.
- (d) As an alternative to operating a CEMS at the inlet to the SO<sub>2</sub>control device (or outlet of the steam generating unit if no SO<sub>2</sub>control device is used) as required under paragraph (a) of this section, an owner or operator may elect to determine the average SO<sub>2</sub>emission rate by sampling the fuel prior to combustion. As an alternative to operating a CEMS at the outlet from the SO<sub>2</sub>control device (or outlet of the steam generating unit if no SO<sub>2</sub>control device is used) as required under paragraph (a) of this section, an owner or operator may elect to determine the average SO<sub>2</sub>emission rate by using Method 6B of appendix A of this part. Fuel sampling shall be conducted pursuant to either paragraph (d)(1) or (d)(2) of this section. Method 6B of appendix A of this part shall be conducted pursuant to paragraph (d)(3) of this section.
- (1) For affected facilities combusting coal or oil, coal or oil samples shall be collected daily in an as-fired condition at the inlet to the steam generating unit and analyzed for sulfur content and heat content according the Method 19 of appendix A of this part. Method 19 of appendix A of this part provides procedures for converting these measurements into the format to be used in calculating the average SO<sub>2</sub>input rate.
- (2) As an alternative fuel sampling procedure for affected facilities combusting oil, oil samples may be collected from the fuel tank for each steam generating unit immediately after the fuel tank is filled and before any oil is combusted. The owner or operator of the affected facility shall analyze the oil sample to determine the sulfur content of the oil. If a partially empty fuel tank is refilled, a new sample and analysis of the fuel in the tank would be required upon filling. Results of the fuel analysis taken after each new shipment of oil is received shall be used as the daily value when

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calculating the 30-day rolling average until the next shipment is received. If the fuel analysis shows that the sulfur content in the fuel tank is greater than 0.5 weight percent sulfur, the owner or operator shall ensure that the sulfur content of subsequent oil shipments is low enough to cause the 30-day rolling average sulfur content to be 0.5 weight percent sulfur or less.

- (3) Method 6B of appendix A of this part may be used in lieu of CEMS to measure SO<sub>2</sub>at the inlet or outlet of the SO<sub>2</sub>control system. An initial stratification test is required to verify the adequacy of the Method 6B of appendix A of this part sampling location. The stratification test shall consist of three paired runs of a suitable SO<sub>2</sub>and CO<sub>2</sub>measurement train operated at the candidate location and a second similar train operated according to the procedures in §3.2 and the applicable procedures in section 7 of Performance Specification 2 of appendix B of this part. Method 6B of appendix A of this part, Method 6A of appendix A of this part, or a combination of Methods 6 and 3 of appendix A of this part or Methods 6C and 3A of appendix A of this part are suitable measurement techniques. If Method 6B of appendix A of this part is used for the second train, sampling time and timer operation may be adjusted for the stratification test as long as an adequate sample volume is collected; however, both sampling trains are to be operated similarly. For the location to be adequate for Method 6B of appendix A of this part 24-hour tests, the mean of the absolute difference between the three paired runs must be less than 10 percent (0.10).
- (e) The monitoring requirements of paragraphs (a) and (d) of this section shall not apply to affected facilities subject to §60.42c(h) (1), (2), or (3) where the owner or operator of the affected facility seeks to demonstrate compliance with the SO₂standards based on fuel supplier certification, as described under §60.48c(f), as applicable.
- (f) The owner or operator of an affected facility operating a CEMS pursuant to paragraph (a) of this section, or conducting as-fired fuel sampling pursuant to paragraph (d)(1) of this section, shall obtain emission data for at least 75 percent of the operating hours in at least 22 out of 30 successive steam generating unit operating days. If this minimum data requirement is not met with a single monitoring system, the owner or operator of the affected facility shall supplement the emission data with data collected with other monitoring systems as approved by the Administrator.

# § 60.47c Emission monitoring for particulate matter.

- (a) Except as provided in paragraphs (c), (d), (e), and (f) of this section, the owner or operator of an affected facility combusting coal, oil, or wood that is subject to the opacity standards under §60.43c shall install, calibrate, maintain, and operate a continuous opacity monitoring system (COMS) for measuring the opacity of the emissions discharged to the atmosphere and record the output of the system. The owner or operator of an affected facility subject to an opacity standard in §60.43c(c) that is not required to use a COMS due to paragraphs (c), (d), (e), or (f) of this section that elects not to use a COMS shall conduct a performance test using Method 9 of appendix A–4 of this part and the procedures in §60.11 to demonstrate compliance with the applicable limit in §60.43c by April 29, 2011, within 45 days of stopping use of an existing COMS, or within 180 days after initial startup of the facility, whichever is later, and shall comply with either paragraphs (a)(1), (a)(2), or (a)(3) of this section. The observation period for Method 9 of appendix A–4 of this part performance tests may be reduced from 3 hours to 60 minutes if all 6-minute averages are less than 10 percent and all individual 15-second observations are less than or equal to 20 percent during the initial 60 minutes of observation.
- (1) Except as provided in paragraph (a)(2) and (a)(3) of this section, the owner or operator shall conduct subsequent Method 9 of appendix A–4 of this part performance tests using the procedures in paragraph (a) of this section according to the applicable schedule in paragraphs (a)(1)(i) through (a)(1)(iv) of this section, as determined by the most recent Method 9 of appendix A–4 of this part performance test results.
- (i) If no visible emissions are observed, a subsequent Method 9 of appendix A–4 of this part performance test must be completed within 12 calendar months from the date that the most recent performance test was conducted or within 45 days of the next day that fuel with an opacity standard is combusted, whichever is later;
- (ii) If visible emissions are observed but the maximum 6-minute average opacity is less than or equal to 5 percent, a subsequent Method 9 of appendix A–4 of this part performance test must be completed within 6 calendar months from the date that the most recent performance test was conducted or within 45 days of the next day that fuel with an opacity standard is combusted, whichever is later;
- (iii) If the maximum 6-minute average opacity is greater than 5 percent but less than or equal to 10 percent, a subsequent Method 9 of appendix A–4 of this part performance test must be completed within 3 calendar months

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from the date that the most recent performance test was conducted or within 45 days of the next day that fuel with an opacity standard is combusted, whichever is later; or

- (iv) If the maximum 6-minute average opacity is greater than 10 percent, a subsequent Method 9 of appendix A–4 of this part performance test must be completed within 45 calendar days from the date that the most recent performance test was conducted.
- (2) If the maximum 6-minute opacity is less than 10 percent during the most recent Method 9 of appendix A–4 of this part performance test, the owner or operator may, as an alternative to performing subsequent Method 9 of appendix A–4 of this part performance tests, elect to perform subsequent monitoring using Method 22 of appendix A–7 of this part according to the procedures specified in paragraphs (a)(2)(i) and (ii) of this section.
- (i) The owner or operator shall conduct 10 minute observations (during normal operation) each operating day the affected facility fires fuel for which an opacity standard is applicable using Method 22 of appendix A–7 of this part and demonstrate that the sum of the occurrences of any visible emissions is not in excess of 5 percent of the observation period ( *i.e.*, 30 seconds per 10 minute period). If the sum of the occurrence of any visible emissions is greater than 30 seconds during the initial 10 minute observation, immediately conduct a 30 minute observation. If the sum of the occurrence of visible emissions is greater than 5 percent of the observation period ( *i.e.*, 90 seconds per 30 minute period), the owner or operator shall either document and adjust the operation of the facility and demonstrate within 24 hours that the sum of the occurrence of visible emissions is equal to or less than 5 percent during a 30 minute observation ( *i.e.*, 90 seconds) or conduct a new Method 9 of appendix A–4 of this part performance test using the procedures in paragraph (a) of this section within 45 calendar days according to the requirements in §60.45c(a)(8).
- (ii) If no visible emissions are observed for 10 operating days during which an opacity standard is applicable, observations can be reduced to once every 7 operating days during which an opacity standard is applicable. If any visible emissions are observed, daily observations shall be resumed.
- (3) If the maximum 6-minute opacity is less than 10 percent during the most recent Method 9 of appendix A–4 of this part performance test, the owner or operator may, as an alternative to performing subsequent Method 9 of appendix A–4 performance tests, elect to perform subsequent monitoring using a digital opacity compliance system according to a site-specific monitoring plan approved by the Administrator. The observations shall be similar, but not necessarily identical, to the requirements in paragraph (a)(2) of this section. For reference purposes in preparing the monitoring plan, see OAQPS "Determination of Visible Emission Opacity from Stationary Sources Using Computer-Based Photographic Analysis Systems." This document is available from the U.S. Environmental Protection Agency (U.S. EPA); Office of Air Quality and Planning Standards; Sector Policies and Programs Division; Measurement Policy Group (D243–02), Research Triangle Park, NC 27711. This document is also available on the Technology Transfer Network (TTN) under Emission Measurement Center Preliminary Methods.
- (b) All COMS shall be operated in accordance with the applicable procedures under Performance Specification 1 of appendix B of this part. The span value of the opacity COMS shall be between 60 and 80 percent.
- (c) Owners and operators of an affected facilities that burn only distillate oil that contains no more than 0.5 weight percent sulfur and/or liquid or gaseous fuels with potential sulfur dioxide emission rates of 26 ng/J (0.060 lb/MMBtu) heat input or less and that do not use a post-combustion technology to reduce SO2 or PM emissions and that are subject to an opacity standard in §60.43c(c) are not required to operate a COMS if they follow the applicable procedures in §60.48c(f).
- (d) Owners or operators complying with the PM emission limit by using a PM CEMS must calibrate, maintain, operate, and record the output of the system for PM emissions discharged to the atmosphere as specified in §60.45c(c). The CEMS specified in paragraph §60.45c(c) shall be operated and data recorded during all periods of operation of the affected facility except for CEMS breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments.
- (e) Owners and operators of an affected facility that is subject to an opacity standard in §60.43c(c) and that does not use post-combustion technology (except a wet scrubber) for reducing PM, SO<sub>2</sub>, or carbon monoxide (CO) emissions, burns only gaseous fuels or fuel oils that contain less than or equal to 0.5 weight percent sulfur, and is operated such that emissions of CO discharged to the atmosphere from the affected facility are maintained at levels less than or equal to 0.15 lb/MMBtu on a boiler operating day average basis is not required to operate a COMS. Owners and

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operators of affected facilities electing to comply with this paragraph must demonstrate compliance according to the procedures specified in paragraphs (e)(1) through (4) of this section; or

- (1) You must monitor CO emissions using a CEMS according to the procedures specified in paragraphs (e)(1)(i) through (iv) of this section.
- (i) The CO CEMS must be installed, certified, maintained, and operated according to the provisions in §60.58b(i)(3) of subpart Eb of this part.
- (ii) Each 1-hour CO emissions average is calculated using the data points generated by the CO CEMS expressed in parts per million by volume corrected to 3 percent oxygen (dry basis).
- (iii) At a minimum, valid 1-hour CO emissions averages must be obtained for at least 90 percent of the operating hours on a 30-day rolling average basis. The 1-hour averages are calculated using the data points required in §60.13(h)(2).
- (iv) Quarterly accuracy determinations and daily calibration drift tests for the CO CEMS must be performed in accordance with procedure 1 in appendix F of this part.
- (2) You must calculate the 1-hour average CO emissions levels for each steam generating unit operating day by multiplying the average hourly CO output concentration measured by the CO CEMS times the corresponding average hourly flue gas flow rate and divided by the corresponding average hourly heat input to the affected source. The 24-hour average CO emission level is determined by calculating the arithmetic average of the hourly CO emission levels computed for each steam generating unit operating day.
- (3) You must evaluate the preceding 24-hour average CO emission level each steam generating unit operating day excluding periods of affected source startup, shutdown, or malfunction. If the 24-hour average CO emission level is greater than 0.15 lb/MMBtu, you must initiate investigation of the relevant equipment and control systems within 24 hours of the first discovery of the high emission incident and, take the appropriate corrective action as soon as practicable to adjust control settings or repair equipment to reduce the 24-hour average CO emission level to 0.15 lb/MMBtu or less.
- (4) You must record the CO measurements and calculations performed according to paragraph (e) of this section and any corrective actions taken. The record of corrective action taken must include the date and time during which the 24-hour average CO emission level was greater than 0.15 lb/MMBtu, and the date, time, and description of the corrective action.
- (f) An owner or operator of an affected facility that is subject to an opacity standard in §60.43c(c) is not required to operate a COMS provided that the affected facility meets the conditions in either paragraphs (f)(1), (2), or (3) of this section.
- (1) The affected facility uses a fabric filter (baghouse) as the primary PM control device and, the owner or operator operates a bag leak detection system to monitor the performance of the fabric filter according to the requirements in section §60.48Da of this part.
- (2) The affected facility uses an ESP as the primary PM control device, and the owner or operator uses an ESP predictive model to monitor the performance of the ESP developed in accordance and operated according to the requirements in section §60.48Da of this part.
- (3) The affected facility burns only gaseous fuels and/or fuel oils that contain no greater than 0.5 weight percent sulfur, and the owner or operator operates the unit according to a written site-specific monitoring plan approved by the permitting authority. This monitoring plan must include procedures and criteria for establishing and monitoring specific parameters for the affected facility indicative of compliance with the opacity standard. For testing performed as part of this site-specific monitoring plan, the permitting authority may require as an alternative to the notification and reporting requirements specified in §§60.8 and 60.11 that the owner or operator submit any deviations with the excess emissions report required under §60.48c(c).

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# § 60.48c Reporting and recordkeeping requirements.

- (a) The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup, as provided by §60.7 of this part. This notification shall include:
- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- (2) If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under §60.42c, or §60.43c.
- (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
- (4) Notification if an emerging technology will be used for controlling SO₂emissions. The Administrator will examine the description of the control device and will determine whether the technology qualifies as an emerging technology. In making this determination, the Administrator may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of §60.42c(a) or (b)(1), unless and until this determination is made by the Administrator.
- (b) The owner or operator of each affected facility subject to the SO₂emission limits of §60.42c, or the PM or opacity limits of §60.43c, shall submit to the Administrator the performance test data from the initial and any subsequent performance tests and, if applicable, the performance evaluation of the CEMS and/or COMS using the applicable performance specifications in appendix B of this part.
- (c) In addition to the applicable requirements in §60.7, the owner or operator of an affected facility subject to the opacity limits in §60.43c(c) shall submit excess emission reports for any excess emissions from the affected facility that occur during the reporting period and maintain records according to the requirements specified in paragraphs (c)(1) through (3) of this section, as applicable to the visible emissions monitoring method used.
- (1) For each performance test conducted using Method 9 of appendix A–4 of this part, the owner or operator shall keep the records including the information specified in paragraphs (c)(1)(i) through (iii) of this section.
- (i) Dates and time intervals of all opacity observation periods;
- (ii) Name, affiliation, and copy of current visible emission reading certification for each visible emission observer participating in the performance test; and
- (iii) Copies of all visible emission observer opacity field data sheets:
- (2) For each performance test conducted using Method 22 of appendix A–4 of this part, the owner or operator shall keep the records including the information specified in paragraphs (c)(2)(i) through (iv) of this section.
- (i) Dates and time intervals of all visible emissions observation periods;
- (ii) Name and affiliation for each visible emission observer participating in the performance test;
- (iii) Copies of all visible emission observer opacity field data sheets; and
- (iv) Documentation of any adjustments made and the time the adjustments were completed to the affected facility operation by the owner or operator to demonstrate compliance with the applicable monitoring requirements.

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- (3) For each digital opacity compliance system, the owner or operator shall maintain records and submit reports according to the requirements specified in the site-specific monitoring plan approved by the Administrator
- (d) The owner or operator of each affected facility subject to the  $SO_2$  emission limits, fuel oil sulfur limits, or percent reduction requirements under  $\S60.42c$  shall submit reports to the Administrator.
- (e) The owner or operator of each affected facility subject to the SO₂emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall keep records and submit reports as required under paragraph (d) of this section, including the following information, as applicable.
- (1) Calendar dates covered in the reporting period.
- (2) Each 30-day average SO<sub>2</sub>emission rate (ng/J or lb/MMBtu), or 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.
- (3) Each 30-day average percent of potential SO₂emission rate calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of the corrective actions taken.
- (4) Identification of any steam generating unit operating days for which SO<sub>2</sub>or diluent (O<sub>2</sub>or CO<sub>2</sub>) data have not been obtained by an approved method for at least 75 percent of the operating hours; justification for not obtaining sufficient data; and a description of corrective actions taken.
- (5) Identification of any times when emissions data have been excluded from the calculation of average emission rates; justification for excluding data; and a description of corrective actions taken if data have been excluded for periods other than those during which coal or oil were not combusted in the steam generating unit.
- (6) Identification of the F factor used in calculations, method of determination, and type of fuel combusted.
- (7) Identification of whether averages have been obtained based on CEMS rather than manual sampling methods.
- (8) If a CEMS is used, identification of any times when the pollutant concentration exceeded the full span of the CEMS.
- (9) If a CEMS is used, description of any modifications to the CEMS that could affect the ability of the CEMS to comply with Performance Specifications 2 or 3 of appendix B of this part.
- (10) If a CEMS is used, results of daily CEMS drift tests and quarterly accuracy assessments as required under appendix F, Procedure 1 of this part.
- (11) If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph (f)(1), (2), (3), or (4) of this section, as applicable. In addition to records of fuel supplier certifications, the report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.
- (f) Fuel supplier certification shall include the following information:
- (1) For distillate oil:
- (i) The name of the oil supplier;
- (ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41c; and
- (iii) The sulfur content or maximum sulfur content of the oil.

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- (2) For residual oil:
- (i) The name of the oil supplier;
- (ii) The location of the oil when the sample was drawn for analysis to determine the sulfur content of the oil, specifically including whether the oil was sampled as delivered to the affected facility, or whether the sample was drawn from oil in storage at the oil supplier's or oil refiner's facility, or other location;
- (iii) The sulfur content of the oil from which the shipment came (or of the shipment itself); and
- (iv) The method used to determine the sulfur content of the oil.
- (3) For coal:
- (i) The name of the coal supplier:
- (ii) The location of the coal when the sample was collected for analysis to determine the properties of the coal, specifically including whether the coal was sampled as delivered to the affected facility or whether the sample was collected from coal in storage at the mine, at a coal preparation plant, at a coal supplier's facility, or at another location. The certification shall include the name of the coal mine (and coal seam), coal storage facility, or coal preparation plant (where the sample was collected);
- (iii) The results of the analysis of the coal from which the shipment came (or of the shipment itself) including the sulfur content, moisture content, ash content, and heat content; and
- (iv) The methods used to determine the properties of the coal.
- (4) For other fuels:
- (i) The name of the supplier of the fuel;
- (ii) The potential sulfur emissions rate or maximum potential sulfur emissions rate of the fuel in ng/J heat input; and
- (iii) The method used to determine the potential sulfur emissions rate of the fuel.
- (g)(1) Except as provided under paragraphs (g)(2) and (g)(3) of this section, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.
- (2) As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO<sub>2</sub> standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.
- (3) As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in §60.42C to use fuel certification to demonstrate compliance with the SO<sub>2</sub>standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.
- (h) The owner or operator of each affected facility subject to a federally enforceable requirement limiting the annual capacity factor for any fuel or mixture of fuels under §60.42c or §60.43c shall calculate the annual capacity factor individually for each fuel combusted. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of the calendar month.

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- (i) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.
- (j) The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

[72 FR 32759, June 13, 2007, as amended at 74 FR 5091, Jan. 28, 2009]

# **Indiana Department of Environmental Management**

Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

#### **Source Background and Description**

Source Name: Genpak, LLC

Source Location: 845 South Elm Street, Scottsburg, Indiana 47170

County: Scott SIC Code: 3086

Permit Renewal No.:T143-31697-00016Permit Reviewer:Donald McQuigg

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Genpak, LLC relating to the operation of a stationary expandable polystyrene (EPS) foam food trays and cups extrusion operation. On April 3, 2012, Genpak, LLC submitted an application to the OAQ requesting to renew its operating permit. Genpak, LLC was issued Part 70 Operating Permit Renewal No. T143-24660-00016 on December 31, 2007.

#### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units:

#### Foam tray production line:

- (a) Three (3) polystyrene foam extrusion operations identified as EPS-1, EPS-2 and EPS-3, each extruding a maximum of 1,400 pounds per hour of polystyrene consisting of the following:
  - (1) Two (2) polystyrene foam scrap regrinders, identified as Regrind-1 and Regrind-2, each with a maximum capacity of 1,266 pounds per hour, using fabric filter as control;
  - (2) Five (5) trim press grinders;
  - (3) Four (4) fluff silos;
  - (4) One polystyrene scrap repelletizer, identified as Repel-1; and
  - (5) One (1) extruded foam roll storage room.

The repelletizer, identified as Repel-1, VOC emissions are controlled by a 20.9 MMBtu/hour boiler, identified as B-1, exhausting to stack S-1. Alternatively, the emissions can be controlled by the 1.0 MMBtu/hr Recuperative Thermal Oxidizer, exhausting through INCIN-1;

#### Foam cup production line:

(1) Mold machines, identified as M-1, molding a maximum of 833 pounds per hour of preexpandable resin beads containing blowing agent and exhausting to the interior of the building. Genpak, LLC Page 2 of 19 Scottsburg, Indiana TSD for T143-31697-00016

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(2) One (1) Pre-Expansion Room, identified as the Pre-Expansion Room, expanding a maximum of 833 pounds per hour of pre-expandable resin beads containing blowing agent, utilizing a boiler to control VOC emissions, exhausting to S-1, and consisting of:

- (A) Material Preparation;
- (B) Pre-Expander, identified as PE-1;
- (C) Pre-Puff, identified as PP-1; and
- (D) One (1) natural gas-fired boiler, identified as B-1, exhausting to stack S-1, with a rated heat input of 20.9 MMBtu per hour.

#### **Insignificant Activities**

The source also consists of the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour;
  - (1) Three (3) process dryers with combined maximum heat input capacity of 1.5 million British thermal units per hour (MMBtu/hr);
  - (2) Fourteen (14) gas unit heaters with combined maximum heat input capacity of 2.0 MMBtu per hour;
  - (3) Three (3) air makeup units with combined maximum heat input of 8.2 MMBtu per hour:
- (b) The following VOC and HAP storage container: Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids with capacities less than forty cubic meters (40m³);
- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6; [326 IAC 8-3-2] [326 IAC 8-3-8]
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: cutting torches and welding equipment for maintenance;
- (e) Closed loop heating and cooling systems;
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (g) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4]
- (h) Enclosed systems for conveying plastic raw materials and plastic finished goods;
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower:
- (j) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: five (5) trim grinders;
- (k) Other activities or categories of activities with emissions equal to or less than insignificant thresholds:

- (1) One (1) 30,000 gallons storage tank, constructed on December 1, 1998, containing the blowing agents (confidential information), designed to operate in excess of 204.9 kPa and without emissions to the atmosphere;
- APET-1 Plastic Extruder, constructed in 1998, with a maximum production rate of 2,100 **(l)** pounds per hour of polystyrene sheets. This process does not use a VOC blowing agent; and
- APET-2 Plastic Extruder, constructed in 2003, with a maximum production rate of 2,100 (m) pounds per hour of polystyrene sheets. This process does not use a VOC blowing agent.

#### **Existing Approvals**

Since the issuance of the Part 70 Operating Permit Renewal No. T143-24660-00016 on December 31, 2007, the source has constructed or has been operating under the following additional approvals:

Experimental Operation (EO) No.: 143-29442-00016 issued on December 3, 2010. (a)

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

#### **Enforcement Issue**

There are no enforcement actions pending.

#### **Emission Calculations**

See Appendix A of this document for detailed emission calculations.

#### **County Attainment Status**

The source is located in Scott County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
1	"

Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM<sub>2.5</sub>.

Ozone Standards (a)

Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Scott County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) Scott County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011, the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability Entire Source section.
- (c) Other Criteria Pollutants
  Scott County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

#### **Fugitive Emissions**

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

#### **Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Unrestricted	Potential Emissions				
Pollutant	Tons/year				
PM	Greater than 250				
PM <sub>10</sub>	Greater than 250				
PM <sub>2.5</sub>	Greater than 250				
SO <sub>2</sub>	Less than 100				
VOC	Greater than 250				
CO	Less than 100				
NO <sub>x</sub>	Less than 100				
GHG as CO₂e	Less than 100,000				
Single HAP	Less than 10				
Total HAP	Less than 25				

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC, PM<sub>10</sub>, and PM<sub>2.5</sub> is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

#### **Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

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(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

#### **Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)										
Process/ Emission Unit	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	СО	GHG as CO₂e	Total HAPs	Worst Single HAP	
EPS-1	-	-	-	-	-		-	-	-	-	
EPS-2	-	-	-	-	-		-	-	-	-	
EPS-3	-	-	-	-	-		-	-	-	-	
Cup Pre-Expansion Room		-		-	-	-	-				
Mold machines	-	-	-	-	-		-	-	-	-	
Regrind-1 and Regrind-2	240 <sup>(1)</sup>	240 <sup>(1)</sup>	240	-	-	<250 <sup>(2)</sup>	-	-	-	-	
Fluff silos	-	-	-	-	-	<b>\230</b>	-	-	-	-	
Parts degreaser	-	-	-	-	-		-	-	-	-	
Trim grinders	2.41	2.41	2.41	-	-		-	-	-	-	
Repellitizer (Repel-1)	-	-	-	-	_		-	-	-	-	
Boiler	0.17	0.68	0.68	0.05	8.97		7.54	10,835	0.17	0.165 (hexane)	
Insignificant natural gas combustion	0.10	0.41	0.41	0.03	5.45		4.58	6,584	0.10	0.098 (hexane)	
Total PTE of Entire Source	242.7	243.5	243.5	0.08	14.43	<250	12.12	17,419	0.27	0.26 (hexane)	
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10	
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	NA	NA	

negl. = negligible

<sup>\*</sup>Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>), not particulate matter (PM), is considered as a "regulated air pollutant".

<sup>\*\*</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

<sup>(1)</sup> PSD minor limit for PM and PM<sub>10</sub> pursuant to Part 70 Operating Permit Renewal No. T143-24660-00016 issued on December 31, 2007. (2) PSD minor limit for VOC pursuant to this permit.

(a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year, emissions of GHGs are less than one hundred thousand (<100,000) tons of CO<sub>2</sub> equivalent (CO<sub>2</sub>e) emissions per year, and it is not in one (1) of the twenty-eight (28) listed source categories.

## **Federal Rule Applicability**

#### **Compliance Assurance Monitoring (CAM)**

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
  - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
  - (2) is subject to an emission limitation or standard for that pollutant; and
  - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Regrinder 1/ PM/PM <sub>10</sub> /PM <sub>2.5</sub>	Baghouse	Υ	831.76	12.48	100	Y	N
Regrinder 2/ PM/PM <sub>10</sub> /PM <sub>2.5</sub>	Baghouse	Υ	831.76	12.48	100	Y	N
Repelletizer/VOC	Boiler or RTO	Y	140.86	27.81	100	Y	N
Pre-Expansion Room/VOC	Boiler or RTO	Y	100.1	9.8	100	Y	N
Mold machines /VOC	Boiler or RTO	Y	<100	<100	100	N	N

- (1) The regrinding process is subject to CAM requirements for PM/PM<sub>10</sub>/PM<sub>2.5</sub> as shown in the above table. The source has submitted a CAM plan as part of the Part 70 Renewal application, and the CAM requirements are included in this Part 70 Permit Renewal.
- (2) The Repelletizing process is subject to CAM requirements for VOC as shown in the above table. The source has submitted a CAM plan as part of the Part 70 Renewal application, and the CAM requirements are included in this Part 70 Permit Renewal.
- (3) The Pre-Expansion Room is subject to CAM requirements for VOC as shown in the above table. The source has submitted a CAM plan as part of the Part 70 Renewal application, and the CAM requirements are included in this Part 70 Permit Renewal.

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#### **NSPS**

(a) The 20.9 MMBtu/hr natural gas-fired boiler is subject to the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60.40c, Subpart Dc), which is incorporated by reference as 326 IAC 12. The 20.9 MMBtu/hr natural gas-fired boiler was constructed prior the applicability date and has a rated capacity greater than 10 MMBtu/hr and less than 100 MMBtu/hr. This boiler only burns natural gas.

Nonapplicable portions of the NSPS will not be included in the permit. The 20.9 MMBtu/hr natural gas-fired boiler is subject to the following portions of Subpart Dc:

- (1) 40 CFR 60.40c(g)(2)
- (2) 40 CFR 60.40c(j)
- (b) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60.110b, Subpart Kb, are not included in the permit for the 30,000 gallon blowing agent storage tank because it is a pressure vessel designed to operate in excess of 204.9 kPa and without emissions to the atmosphere. Pursuant to 40 CFR 60.110(d)(2), this subpart does not apply to this type of storage vessel.
- (c) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60.110b, Subpart Kb, are not included in the permit for the vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids because each vessel capacity is less than forty cubic meters (40m³).

#### **NESHAP**

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters. Subpart DDDDD are not included in the permit for the 20.9 MMBtu/hr natural gas-fired boiler. The boiler is not located at a major source of HAPs as defined in 40 CFR 63.2. On March 21, 2011, U.S. EPA issued the final rule for 40 CFR 63, Subpart DDDDD -National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters at major sources. On May 18, 2011, the EPA published a notice delaying the effective date of the boiler major source rule (Boiler MACT) until the completion of the reconsideration or the completion of the litigation of the rule, whichever is earlier. However, on January 9, 2012, the U.S. District Court for the DC Circuit vacated the EPA's May 18, 2011, notice that delayed the effective date of the boiler MACT rule. Based upon this, NESHAP Subpart DDDDD is an effective rule, and therefore, major sources must comply with its requirements. EPA issued a "No Action Assurance Letter" that it will exercise its enforcement discretion to not pursue enforcement action for violations of certain notification deadlines in the final Boiler MACT.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, Subpart JJJJJJ are not included in the permit for the 20.9 MMBtu/hr boiler B-1. The boiler B-1 is an existing effected source under Subpart JJJJJJ. However, pursuant to 40 CFR 63.11195(e), a natural gas-fired boiler is not subject to this subpart.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning, Subpart T are not included in the permit for the cold cleaner degreaser. Chlorinated solvents are not used in the cold cleaner degreaser.

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(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

#### State Rule Applicability - Entire Source

## 326 IAC 1-5-2 (Emergency Reduction Plans)

The source is subject to 326 IAC 1-5-2.

#### 326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is subject to 326 IAC 1-6-3.

#### 326 IAC 2-2 (Prevention of Significant Deterioration)

- (a) The total PM emissions from the two (2) polystyrene foam scrap regrinders controlled by fabric filters shall not exceed the 54.8 pounds per hour.
- (b) The total PM<sub>10</sub> emissions from the two (2) polystyrene foam scrap regrinders controlled by fabric filters shall not exceed the 54.8 pounds per hour.
- (c) Pursuant to this permit, VOC emissions shall be limited to less than 250 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this condition shall render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable for VOC, PM, and  $PM_{10}$ .

#### 326 IAC 2-4.1 (New Sources Toxics Control)

This source, constructed after July 27, 1997, does not have the potential to emit (PTE) ten (10) tons per year of any single HAP or twenty-five (25) tons per year of any combination of HAPs, therefore, the requirements of 326 IAC 2-4.1 do not apply.

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and  $PM_{10}$  is less than two hundred fifty (250) tons per year; and the potential to emit of CO, NOx, and  $SO_2$  is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2015 and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

#### 326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1)

#### 326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

#### 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is located in Decatur County. There are no facilities located at this source that have the potential to emit greater than twenty-five (25) tons per year of fugitive particulate matter. This source has not added a facility with the potential to emit fugitive particulate matter greater than 25 tons per year, which requires a permit as set forth in 326 IAC 2, after December 13, 1985. Therefore, pursuant to 326 IAC 6-5-1, this source is not subject to the requirements of 326 IAC 6-5.

#### 326 IAC 6.5 PM Limitations Except Lake County

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne.

#### State Rule Applicability - Regrinder, Repellitizer, and Pre-Expansion Room

#### 326 IAC 6-3 (Particulate Emission Limitation for Manufacturing Processes)

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitation for Manufacturing Processes), the allowable PM emission rate from each of the two (2) polystyrene foam scrap regrinders shall not exceed 3.02 pounds per hour when operating at a process weight rate of 1,266 pounds per hour.

The pound per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$
 where  $E =$  rate of emission in pounds per hour;  
 $P =$  process weight rate in tons per hour

The fabric filters shall be in operation at all times the two (2) polystyrene foam scrap regrinders are in operation, in order to comply with this limit.

(b) Pursuant to 326IAC 6-3-1(b)(14), the five (5) trim grinders are exempt from the provisions of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because particulate emissions from the five (5) trim grinders are less than five hundred fifty-one thousandths (0.551) pounds per hour.

#### 326 IAC 8-1-6 (General Reduction Requirements):

- (a) Pursuant to SSM No. 143-25032-00016, issued December 13, 2007, and 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the food trays production line emission units shall be the following:
  - (1) The VOC emissions from the polystyrene foam scrap repelletizer, Repel-1, shall be controlled by either the 20.9 MMBtu/hour boiler B-1 or the 1.0 MMBtu/hr RTO. The boiler B-1 and the 1.0 MMBtu/hr RTO shall each have a minimum destruction efficiency of 95%.
  - (2) The capture system for the repelletizer, Repel-1, shall have a minimum capture efficiency of 85%.
  - (3) The blowing agent input to the three (3) polystyrene foam extrusion operations (EPS-1, EPS-2 and EPS-3) shall be limited to 906.66 tons per twelve (12) month consecutive period.
  - (4) No add-on controls are required for the fluff silos.

Compliance with this condition shall limit the combined VOC emissions to 170.43 tons per twelve (12) month consecutive period from the Extrusion, Roll Storage, Thermoform, Repelletizer and the Fluff Silos.

- (b) Pursuant to Significant Source Modification 143-11382-00016, issued on February 10, 2000, and 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the Pre-Expansion Room shall be the following:
  - (1) The blowing agent input to the Foam Cup Production Line, shall be limited to 182 tons per twelve (12) consecutive month period, with compliance at the end of each month. This blowing agent input shall limit the VOC emissions from the Pre-Expansion Room and Mold Machines (M-1) to 64.36 tons of VOC emissions per 12 consecutive month period.

- (2) The VOC emissions from the Pre-Expansion Room shall be controlled by the 20.9 MMBtu/hour boiler. The boiler shall have a minimum destruction efficiency of 95%. The boiler B-1 shall be used at all times that the Pre-Expansion Room is in operation.
- (3) The capture system for the Pre-Expansion Room shall have a minimum capture efficiency of 95%.
- (4) No add-on controls are required for the Mold Machines, identified as M-1.

Compliance with these conditions shall satisfy the requirements of 326 IAC 8-1-6 (General Reduction Requirements). Compliance with these conditions shall render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable for VOC.

#### State Rule Applicability – Natural Gas-Fired Combustion Units

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

(a) The natural gas-fired boiler on the Pre-Expansion Room, rated at 20.9 million British thermal units per hour, capable of burning only natural gas fuel, is subject to the particulate matter limitations of 326 IAC 6-2. Pursuant to this rule, the natural gas fired boiler on the Pre-Expansion Room is limited by the following equation from 326 IAC 6-2-4:

 $Pt = 1.09/Q^{0.26}$ 

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input Q = total source maximum indirect heater input = natural gas fired boiler on the Pre-Expansion Room = 20.9 MMBtu/hr

 $Pt = 1.09/20.9^{0.26} = 0.50 lbs PM/MMBtu$ 

The uncontrolled PM emissions of 0.002 lbs PM/MMBtu [(0.17 tons PM/yr) \* (hr/20.9 MMBtu) \* (yr/8,760 hrs) \* (2,000 lbs/ton)] are less than the allowable PM emissions; therefore, the natural gas fired boiler on the Pre-Expansion Room is able to comply with the requirements of 326 IAC 6-4.

- (b) The natural gas-fired combustion sources, identified as air makeup heaters, process dryer, and RTO, are not subject to this rule because they are not sources of indirect heating. Therefore, the requirements of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) are not applicable.
- 326 IAC 6-3 (Particulate Emission Limitations from Manufacturing Processes)

Pursuant to 326IAC 6-3-1(b)(14), the natural gas-fired combustion units, identified as air makeup heaters, process dryer, and RTO, are exempt from the provisions of 326 IAC 6-3 (Particulate Emission Limitations from Manufacturing Processes) because particulate emissions from the natural gas-fired space heaters and air make-up units are less than five hundred fifty-one thousandths (0.551) pounds per hour.

#### 326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

The natural gas-fired combustion units located at the source do not have the potential to emit greater than twenty-five (25) tons of  $SO_2$  per year or ten (10) pounds of  $SO_2$  per hour. Therefore, the natural gas-fired combustion units are not subject to the requirements of 326 IAC 7-1.1.

## State Rule Applicability - Cold Cleaner Degreaser

326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the degreasing operation without a remote solvent reservoir is subject to the

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requirements of 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements) because they were constructed after July 1, 1990.

- (a) The Permittee shall ensure the following control equipment and operating requirements are met:
  - (1) Equip the degreaser with a cover.
  - (2) Equip the degreaser with a device for draining cleaned parts.
  - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
  - (5) Provide a permanent, conspicuous label that lists the operating requirements in (a)(3), (a)(4), (a)(6), and (a)(7) of this condition.
  - (6) Store waste solvent only in closed containers.
  - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) The Permittee shall ensure the following additional control equipment and operating requirements are met:
  - (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent used is insoluble in, and heavier than, water.
    - (C) A refrigerated chiller.
    - (D) Carbon adsorption.
    - (E) An alternative system of demonstrated equivalent or better control as those outlined in (b)(1)(A) through (D) of this condition that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
  - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
  - (3) If used, solvent spray:
    - (A) must be a solid, fluid stream; and
    - (B) shall be applied at a pressure that does not cause excessive splashing.

326 IAC 8-3-8 (Material requirements for cold cleaner degreasers)

- (a) Material requirements specified in this section for use in cold cleaner degreasers apply as follows:
  - (1) Before January 1, 2015, in Clark, Floyd, Lake, and Porter Counties.

- (2) On and after January 1, 2015, anywhere in the state.
- (b) Material requirements are as follows:
  - Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.
- (c) Pursuant to 326 IAC 8-3-8(c)(1), the following records shall be maintained for each sale of cold cleaner degreaser solvent:
  - (1) The name and address of the solvent supplier.
  - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
  - (3) The type of solvent purchased.
  - (4) The volume of each unit of solvent sold.
  - (5) The total volume of the solvent purchased.
  - (6) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (d) Pursuant to 326 IAC 8-3-8(c)(2), the following records shall be maintained for each purchase of cold cleaner degreaser solvent:
  - (1) The name and address of the solvent supplier.
  - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
  - (3) The type of solvent purchased.
  - (4) The total volume of the solvent purchased.
  - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

#### State Rule Applicability - VOC Storage Vessels

# 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

- (a) The one (1) 30,000 gallon VOC storage tank has a capacity less than 39,000 gallons. Therefore, the requirements of 326 IAC 8-4-3 are not applicable.
- (b) The vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids each have a capacity less than 39,000 gallons. Therefore, the requirements of 326 IAC 8-4-3 are not applicable.

#### 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The one (1) 30,000 gallon above ground vertical fixed roof volatile organic compound liquid storage tank and the vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids are

not subject to the provisions of 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) because the storage vessels are not located in Clark, Floyd, Lake, or Porter County.

## **Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance determination requirements applicable to this source are as follows:

- (a) The 20.9 MMBtu/hr boiler B-1 or the 1.0 MMBtu/hr Recuperative Thermal Oxidizer (RTO) shall be operated at all times that the repelletizer, identified as Repel-1, is in operation.
- (b) The 20.9 MMBtu/hr boiler B-1 shall be operated at all times the Pre-Expansion Room is in operation.
- (c) VOC testing, including capture and destruction efficiency testing, shall be performed for the 20.9 MMBtu/hr boiler B-1 and the 1.0 MMBtu/hr RTO to determine the operating temperature and fan amperage that will achieve 95 % destruction efficiency, and capture efficiencies of 95% and 85% for the pre-expansion room and repelletizer capture systems, respectively.
- (d) Pursuant to Significant Source Modification 143-11382-00016, issued on February 10, 2000 and 326 IAC 8-1-6 (BACT), compliance with the blowing agent input limit to the Foam Cup Line shall be determined using the following equation:

$$B_u = \sum_{i=1}^{n} (E_b) * (P_c)$$

where:

 $B_{II}$  = Monthly blowing agent input, (tons/month).

 $E_b$  = Pre-expanded beads usage during the month, (tons/month)

P<sub>c</sub> = Percentage of blowing agent in the pre-expanded beads, (%)

= Number of types of pre-expanded beads used during the month

= Pre-expanded bead type

The compliance monitoring requirements applicable to this source are as follows:

(a) The 20.9 MMBtu/hr boiler B-1 or the 1.0 MMBtu/hr RTO controlling the repelletizer, identified as Repel-1, shall each maintain a minimum operating temperature of 1,400 °F and minimum operating fan amperage of twelve (12.0) amps during operation.

- (b) The 20.9 MMBtu/hr boiler B-1 controlling the Pre-Expansion Room shall maintain a minimum operating temperature of 1,400 °F and minimum operating fan amperage of twelve (12.0) amps during operation.
- (c) A continuous temperature monitoring system shall be calibrated, maintained and operated on the 20.9 MMBtu/hr boiler B-1 and the 1.0 MMBtu/hr Recuperative Thermal Oxidizer for measuring operating temperature when the repelletizer, identified as Repel-1, and the Pre-Expansion Room are in operation. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average.
- (d) The duct pressure or fan amperage shall be observed at least once per day for the boiler B-1 or 1.0 MMBtu/hr RTO whenever each control is operating. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained at a minimum operating fan amperage of 12.0 amps or within the normal range as established in most recent compliant stack test.
- (e) Pursuant to 40 CFR Part 64 (CAM), the Permittee shall comply with the following Compliance Assurance Monitoring requirements for the 20.9 MMBtu/hr Boiler and the 1.0 MMBtu/hr RTO controlling the repelletizer Repel-1:
  - (1) Monitoring Approach for the Capture System on the repelletizer, identified as Repel-1.

I. Indicator	Work Practice
Measurement Approach	Inspect the operational condition of the control device and the integrity of the exhaust system from the process to the control device.
	Record duct pressure and fan amperage established during the most recent stack tests.
II. Indicator Range	An excursion of the duct pressure and fan amperage is identified as any finding that the integrity of the exhaust system ductwork has been compromised.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria	
A. Data Representativeness	Leak-free ductwork of the process will assure that all of the exhaust will reach the control device. Inspections will identify problems.
B. Verification of Operational Status	Inspection records.
C Monitoring Frequency	Once Daily
Data Collection Procedure	Record results of inspections and observations.
D. Recordkeeping	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.
E. Reporting	Number, duration, cause of any excursion and the corrective action taken.

I. Indicator	Work Practice
Reporting Frequency	Quarterly

(2) Monitoring Approach for the 20.9 MMBtu/hr Boiler and the 1.0 MMBtu/hr RTO Controlling the Repelletizer, Repel-1:

		Indicator #1	Indicator #2	Indicator #3
I.	Indicator	Boiler and RTO combustion zone temperature.	Work practice/inspection.	Performance tests
	Measurement Approach	Continuously monitor the operating temperature of the Boiler and the RTO combustion zone, whichever control is used.	Inspect internal and external structural integrity of Boiler and RTO to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.
II.	Indicator Range	An excursion is identified as a measurement of 50°F less than the average temperature demonstrated during the most recent compliance demonstration, or as any 3-hour period when the average temperature is less than the average temperature demonstrated during the most recent compliance demonstration.	An excursion is identified as any finding that the structural integrity of the Boiler and the RTO has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the Boiler and the RTO does not meet the permitted destruction efficiency.
	Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III.	Performance Criteria			
A.	Data Representativeness	Any temperature-monitoring device employed to measure the control combustion zone temperature shall be accurate to within 1.0% of temperature measured or ±1°C, whichever is greater.	Inspections of the Boiler and RTO will identify problems.	A test protocol shall be prepared and approved by the IDEM prior to conducting the performance test.
B.	Verification of Operational Status	Temperatures recorded on chart paper or electronic media. The Permittee must have valid data from at least 90 percent of the hours during which the process operated.	Inspection records.	Not applicable.
C.	QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria ± 20°F.	Not applicable.	EPA test methods approved in protocol.
D.	Monitoring Frequency	Measured continuously	External Inspection – annually Internal inspection – annually.	Once every five years.
	Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.
	Averaging Period	Not applicable if using any measured value as indicator; Three hours if using 3-hour average as indicator.	Not applicable.	Not applicable.

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	Indicator #1	Indicator #2	Indicator #3
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to IDEM at least 35 days prior to test date. Submit test report 45 days after conducting a performance test.
Frequency	Quarterly.	Annually.	For each performance test conducted.

- (i) Pursuant to 40 CFR Part 64 (CAM), the Permittee shall comply with the following Compliance Assurance Monitoring requirements for the 20.9 MMBtu/hr boiler B-1 controlling the Pre-Expansion Room:
  - (1) Monitoring Approach for the Capture System on the Pre-Expansion Room.

I. Indicator	Work Practice
Measurement Approach  Indicator Range  Corrective Action  Performance Criteria  Data Representativeness  Verification of Operational Status  Monitoring Frequency ata Collection Procedure	Inspect the operational condition of the control device and the integrity of the exhaust system from the process to the control device.
	Record duct pressure and fan amperage established during the most recent stack tests.
II. Indicator Range	An excursion of the duct pressure and fan amperage is identified as any finding that the integrity of the exhaust system ductwork has been compromised.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria	
A. Data Representativeness	Leak-free ductwork of the process will assure that all of the exhaust will reach the control device. Inspections will identify problems.
B. Verification of Operational Status	Inspection records.
C. Monitoring Frequency	Once Daily
Data Collection Procedure	Record results of inspections and observations.
D. Recordkeeping	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.
E. Reporting	Number, duration, cause of any excursion and the corrective action taken.
Reporting Frequency	Quarterly

(2) Monitoring Approach for The 20.9 MMBtu/hr boiler B-1 Controlling the Pre-Expansion Room:

		Indicator #1	Indicator #2	Indicator #3
I.	Indicator	Boiler combustion zone temperature.	Work practice/inspection.	Performance test
	Measurement Approach	Continuously monitor the operating temperature of the Boiler combustion zone.	Inspect internal and external structural integrity of Boiler to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.
Π.	Indicator Range	An excursion is identified as a measurement of 50°F less than the average temperature demonstrated during the most recent compliance demonstration, or as any 3-hour period when the average temperature is less than the average temperature demonstrated during the most recent compliance demonstration.	An excursion is identified as any finding that the structural integrity of the Boiler has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the Boiler does not meet the permitted destruction efficiency.
	Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III.	Performance Criteria			
A.	Data Representativeness	Any temperature-monitoring device employed to measure the Boiler combustion zone temperature shall be accurate to within 1.0% of temperature measured or ±1°C, whichever is greater.	Inspections of the Boiler system will identify problems.	A test protocol shall be prepared and approved by the IDEM prior to conducting the performance test.
B.	Verification of Operational Status	Temperatures recorded on chart paper or electronic media. The Permittee must have valid data from at least 90 percent of the hours during which the process operated.	Inspection records.	Not applicable.
C.	QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria <u>+</u> 20°F.	Not applicable.	EPA test methods approved in protocol.
D.	Monitoring Frequency	Measured continuously	External Inspection – annually Internal inspection – annually.	Once every five years.
	Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.
	Averaging Period	Not applicable if using any measured value as indicator. Three hours if using 3-hour average as indicator.	Not applicable.	Not applicable.
E.	Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections, including dates and initials of person conducting inspection, and of corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted.  Maintain records of corrective actions taken in response to excursions.
F.	Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to IDEM at least 35 days prior to test date. Submit test report 45 days after conducting a performance test.

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- (j) Pursuant to 40 CFR Part 64, the Permittee shall comply with the following Compliance Assurance Monitoring requirements for the fabric filters controlling the polystyrene foam scrap regrinder (Regrind-1):
  - (1) Monitoring Approach -

PARAMETER	INDICATOR NO. 1	INDICATOR NO. 2	INDICATOR NO. 3
Indicator     Measurement Approach	PM/ and PM10 Concentration	Visible Emissions	Fabric Filters Condition
	U.S. EPA Method 5 and Method 201A or other Methods approved by the Commissioner – Fabric Filters for Regrind-1	Method 9 visual observations.	Visual inspection.
II. Indicator Range	PM/PM10 emissions limit of 54.8 pounds/hr each  Pressure drop range of 1.0 to 6.0 inches	Abnormal emissions are observed	An excursion is defined as failure to perform the monthly inspection.
III. Performance Criteria			
A. Data Representativeness	Stack Testing	Procedures addressed in Method 9	Fabric Filters inspected visually for leaks.
B. QA/QC Practices and Criteria	U.S. EPA Method 5 and Method 201A or other Methods approved by the Commissioner – Fabric Filters for Regrind-1	Use of a certified visible emission observer.	Trained personnel perform inspections and maintenance.
C. Monitoring Frequency	Once every 5 years.	once daily when Regrind-1 is operating unless inclement weather.	Monthly
D. Data Collection Procedures	U.S. EPA Method 5, Method 201A or other Methods approved by the Commissioner	Daily visual observations are recorded	Results of inspections and maintenance activities performed are recorded in the maintenance log.
E.Record Keeping	Maintain for a period of 5 years until another test is conducted.  Maintain for a period of 5 years of corrective actions taken in response to the pressure drop excursion	Maintain for a period of 5 years records of visible emission notations	Maintain for a period of 5 years of corrective actions taken in response to excursions.
F. Reporting	Submit test protocol and notification of testing to IDEM at least 35 days prior to test date. Submit test report 45.		
Frequency	For each performance test conducted.		

The above requirements are required to ensure compliance with the 326 IAC 6-3 (Particulate Emissions for Manufacturing Processes), 326 IAC 8-1-6 (General Reduction Requirements), 326 IAC 2-2 (PSD), and 40 CFR Part 64 (CAM).

#### **Recommendation and Conclusion**

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal No. T143-31697-00016 be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 3, 2012.

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The operation of this stationary expandable polystyrene (EPS) foam food trays and cups extrusion operation shall be subject to the conditions of the attached Part 70 Operating Permit Renewal Renewal No. T143-31697-00016.

#### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Donald McQuigg at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-4240 or toll free at 1-800-451-6027 extension 4-4240.
- (b) A copy of the findings is available on the Internet at: <a href="http://www.in.gov/ai/appfiles/idem-caats/">http://www.in.gov/ai/appfiles/idem-caats/</a>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

# Appendix A: Emission Calculations **Summary of Emissions**

Company Name: Genpak, LLC

Address City IN Zip: 845 South Elm Street, Scottsburg, IN 47170

Part 70 Operating Permit Renewal No.: T143-31697-00016

Permit Reviewer: Donald McQuigg

Date: June 23, 2012

	Unlimited Potential To Emit (tons/year)									
Emission Units	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	voc	со	GHG as CO₂e	Total HAP	Single Worst HAP
EPS-1	-	-	-	-	-	5.48	_	÷-	_	
EPS-2	-	-	-	-	-	5.48	-	_		-
EPS-3	-		-	-		5.48	ı	-	-	-
Cup Pre-Expansion Room	-	-	-	-	-	100.1		-	1	-
Mold Machines	-	-	-		-	54.6	ı	-	ı	-
Regrinders 1 and 2	332.7	332.7	332.7	-	-	-	1	· -	-	-
Fluff silos	-	_	-	-	_	83.53	-	-		-
Trim grinders	2.41	2.41	2.41	-	-	-	-	-	-	-
Repelletizer	_	-	-		-	102.09	-	-	-	-
Boiler	0.17	0.68	0.68	0.05	8.97	0.49	7.54	10,835	-	-
Insignificant natural-gas combustion	0.10	0.41	0.41	0.03	5.45	0.30	4.58	6,584	0.103	0.098 (hexane)
TOTAL	335.4	336.2	336.2	0.1	14.4	357.5	12.1	17,419	<25	<10 (hexane)

		Limit	ed/Conti	olled P	otentia	al to Em	it Afte	r Issuance	e (tons/ye	ear)
Emission Units	РM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	voc	ÇO	GHG as CO₂e	Total HAP	Single Worst HAP
EPS-1	1	-		-	-		-		1	-
EPS-2	-	-	-	-	-		-			-
EPS-3	-		-	-	-			ī	-	-
Cup Pre-Expansion Room	ı	-	-	-	-		-	ı	1	_
Mold Machines	-	f		-	-		-	1	Ī	
Regrinders 1 and 2	240 <sup>(1)</sup>	240	240	-	-	<250 <sup>(2)</sup>		1	1	_
Fluff silos	1	1			-		-	-	-	-
Trim grinders	2.41	2.41	2.41	1	-		-	-	-	-
Repelletizer	-	ı	ı	-	_		1	-	-	-
Boiler	0.17	0.68	0.68	0.05	8.97		7.54	10,835	0.17	0.162 (hexane)
Insignificant natural-gas combustion	0.10	0.41	0.41	0.03	5.45		4.58	6,584	0.10	0.098 (hexane)
TOTAL	242.7	243.5	243.5	0.1	14.4	<250	12.1	17,419	<25	<10 (hexane)

PM=PM<sub>10</sub>=PM<sub>2.5</sub>

<sup>(1)</sup> PSD minor limit for PM and PM<sub>10</sub> pursuant to Part 70 Operating Permit Renewal No. T143-24660-00016 issued on December 31, 2007.

<sup>(2)</sup> PSD minor limit for VOC pursuant to this permit.

#### Appendix A: Emission Calculations VOC Emission Calculations for Foam Tray and Cup Lines

Company Name: Genpak, LLC

Address City IN Zip: 845 South Elm Street, Scottsburg, IN 47170

Part 70 Operating Permit Renewal No.: T143-31697-00016

Permit Reviewer: Donald McQuigg

Date: June 23, 2012

	Throu	ghput				UNCONTROLLED POTENTIAL TO EMIT VOC								
Emission Units	Description	Blowing Agent <sup>(1)</sup>	Extrusion, Roll Thermof		Repell	etizer <sup>(1)</sup>	Fluff Si	ilos <sup>(1),(2)</sup>		pansion om	Mold M	achines	TOTAL \	OC PTE
		(lbs/hr)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
EPS-1	Blowing Agent	37.94	1.25	5.48										
EPS-2	Blowing Agent	37.94	1.25	5.48	23.31	102.09	19.07	83.53					46.13	202.05
EPS-3	Blowing Agent	37.94	1.25	5.48					10.0000					
Foam Cup Line	-	-							22.85	100.1	12.47	54.62	35,32	154.70
TOTAL		113.82		T									81.45	356.75

			C	ONTROLLED	POTENT	IAL TO E	VIT VOC							
Emission Units	Repelletizer and	ficiency for d Pre-Expansion oom	Extrusion, Roll Thermof	Storage, and	Repelle	tizer <sup>(3),(4)</sup>	Fluff S	Silos <sup>(4)</sup>		pansion ım <sup>(3)</sup>	Mold M	lachines	Total Uncaptured VOC	TOTAL VOC PTE
	% Capture	% Destruction	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)	(tons/yr)	(tons/yr)
EPS-1			2,28	9.96				,						
EPS-2	85%	95%	2.28	9.96	1.80	7.89	34.69	151.92					27.85	217.56
EPS-3			2.28	9.96										
Foam Cup Line	95%	95%							1.09	4.75	12.47	54.62	5,00	64.38
TOTAL				29,89			·		-				32.86	281.94

<sup>(1)</sup> Revised 2012 blowing agent emission data for the foam tray line provided by the source on 2/7/2013.

#### Notes:

(provided by the source) Blowing agent recycle rate to silos and repelletizer (lb/hr) = 42.38 45.0% (provided by the source) VOC recycle ratio to silos (%) = VOC recycle ratio to repelletizer (%) = 55.0% (provided by the source) Foam Tray 326 IAC 8-1-6 BACT VOC Input limit (ton/yr) = 906.70 Actual VOC input to foam tray line (ton/yr) = 498.53 Proportional adjustment factor = 1.82 Repelletizer VOC recycle to the boiler (ton/yr) = 185.68

#### METHODOLOGY

Proportional adjustment factor = BACT VOC Input Limit (tons/yr) / Actual Foam Tray VOC Input (tons/yr)

Silo VOC PTE (lbs/hr) = Blowing agent recycle rate (lbs/hr) \* Recycle to silo (%)

Repelletizer VOC PTE (lbs/hr) = Blowing agent recycle rate (lbs/hr) \* Recycle to repelletizer (%)

Silo VOC PTE (ton/yr) = Silo VOC PTE (lbs/hr) \* 8760 hrs/yr/2000 lbs/ton

Repelletizer VOC PTE (lbs/hr) = Repelletizer VOC PTE (lbs/hr) \* 8760 hrs/yr/2000 lbs/ton

Repelletizer VOC recycle to the boiler (ton/yr) = Blowing Agent Recycle Rate (lb/hr) \* Proportional Adjustment Factor \* VOC recycle ratio to Repelletizer (%) \* 8760 (hrs/yr)/2000 (lbs/ton)

Uncaptured Repelletizer VOC to the boiler (ton/yr) = Blowing Agent Recycle Rate (lb/hr) \* Proportional Adjustment Factor \* VOC recycle ratio to Repelletizer (%) \* 8760 (hrs/yr)/2000 (lbs/ton) \* (1- Capture Efficiency)

Uncaptured Pre-Expansion Room VOC to the boiler (ton/yr) = Blowing Agent Recycle Rate (lb/hr) \* Proportional Adjustment Factor \* VOC recycle ratio to Repelletizer (%) \* 8760 (hrs/yr)/2000 (lbs/ton) \* (1- Capture Efficiency)

Controlled VOC Emissions (tons/yr) = Potential VOC Emissions (tons/yr) \* Capture Efficiency \* (1 - Destruction Efficiency)

<sup>(2)</sup> Composite emissions from the four (4) fluff silos.

<sup>(3)</sup> VOC emissions controlled by the 20.9 MMBtu/hr boiler.

<sup>(4)</sup> VOC potential to emit was proportionately adjusted to reflect the allowable BACT VOC input limitation.

## Appendix A: Emission Calculations **VOC Emission Calculations for Foam Cup Line**

Company Name: Genpak, LLC

Address City IN Zip: 845 South Elm Street, Scottsburg, IN 47170

Part 70 Operating Permit Renewal No.: T143-31697-00016

Permit Reviewer: Donald McQuigg

**Date:** June 23, 2012

#### **Uncontrolled VOC Emissions**

	Ra	w Material Inp	ut*		Pre-Exp	ansion Room		Mold M	achines	
Emission Unit	Max. Throughput (lbs/yr)	Blowing Agent in Foam (%)	Total Biowing agent in Foam (ton/yr)	l Acent	VOC Emissions (ton/yr)	Blowing Agent Retention (%)	Blowing Agent Retention (ton/yr)	Blowing Agent Emission (%)	VOC Emissions (ton/yr)	Total VOC Emissions (ton/yr)
Foam Cup Line	7,000,000	5.2%	182.0	55.0%	100.1	15.0%	27.3	30.0%	54.6	154.7

<sup>\*</sup> Polystyrene beads raw material containing blowing agent is purchased for this process.

#### Controlled VOC Emissions

	Ra	w Material Inp	out		Pre-Exp	ansion Room		Mold M		
Emission Unit	Max. Throughput (lbs/yr)	Blowing Agent in Foam (%)	Total Blowing agent in Foam <sup>(1)</sup> (ton/yr)	Blowing Agent Emission (%)	VOC Emissions* (ton/yr)	Blowing Agent Retention (%)	Blowing Agent Retention (ton/yr)	Blowing Agent Emission (%)	VOC Emissions (ton/yr)	Total VOC Emissions (ton/yr)
Foam Cup Line	7,000,000	5.2%	182.0	55.0%	4.75	15.0%	27.3	30.0%	54.6	59.4

<sup>\*</sup> VOC emissions controlled by the 20.9 MMBtu/hr boiler:

Capture Efficiency =

95.0%

Destruction Efficiency =

95.0%

#### **METHODOLOGY**

Uncontrolled Pre-Expansion Room VOC emissions (ton/yr) = Total Blowing Agent in Foam input (ton/yr) \* Blowing Agent Emissions (%)

Controlled Pre-Expansion Room VOC emissions (ton/yr) = Total Blowing Agent in Foam input (ton/yr) \* Blowing Agent Emissions (%) \* Capture Efficiency \* (1-Destruction Efficience)

Uncontrolled Mold Machines VOC emissions (ton/yr) = Total Blowing Agent in Foam input (ton/yr) \* Blowing Agent Emissions (%)

Controlled VOC Emissions (tons/yr) = Potential VOC Emissions (tons/yr) \* Capture Efficiency \* (1 - Destruction Efficiency)

<sup>(1) 326</sup> IAC 8-1-6 BACT Limit pursuant to SSM No. 143-11382-00016

# Appendix A: Emission Calculations Potential Particulate Emissions from EPS Regrind Operations

Company Name: Genpak, LLC

Address City IN Zip: 845 South Elm Street, Scottsburg, IN 47170

Part 70 Operating Permit Renewal No.: T143-31697-00016

Permit Reviewer: Donald McQuigg

Date: June 23, 2012

	Through	out			PM/	/PM <sub>10</sub> /PM <sub>2.5</sub> F	Potential En	nissions	
Description	Emission Unit ID	Max Rate (lb/hr)	Actual Rate (lb/hr)	Uncoi lb/hr	ntrolled ton/yr	Contr lb/hr	olled ton/yr	326 IAC 6-3-: lb/hr	2 Allowable PM ton/yr
Scrap	Regrinder 1	1,266	542	37.98	166.35	0.38	1.66	3.02	13.22
Regrind	Regrinder 2	1,266	542	37.98	166.35	0.38	1.66	3.02	13.22
TOTAL				75.96	332.70	0.76	3.33	6.04	26.44

3.00%

99.0%

39.0%

0.633

#### Notes:

The ground foam from the regrinders is ducted to the fluff silos where particulate emissions are controlled by dry filters.

PS = polystyrene polymer

PM carry over to silo fabric filter = Fabric filter control efficiency >=

Scrap rate from thermoformer =

#### METHODOLOGY:

Max PS throughput (lbs/yr)=22,334,634 lbs \* 8760 (hrs/yr)/8040 hrs actual =

Max PS throughput (lbs/hr)= Max PS throughput (lbs/yr) \* 1 yr/8760 hrs =

Regrinder actual rate (lbs/hr) = Max PS throughput (lbs/hr) \* Thermoformer Scrap Rate (%)

Uncontrolled emissions (lbs/hr) = Regrinder bottleneck rate (lbs/hr) \* PM carryover (%)

Uncontrolled emissions (tons/yr) = Uncontrolled emissions (lbs/hr) \* 8760 (hrs/yr)/2000 (lbs/ton)

Regrinder process weight rate P (tons/hr) =

326 IAC 6-3-2 Allowable PM Emissions (lbs/hr) = 4.10 \* P ^ 0.67

24,334,750 2,778

(provided by the source)

(provided by the source)

(provided by the source)

# Appendix A: Emissions Calculations **Natural Gas Combustion Only** MM BTU/HR <100

Company Name: Genpak, LLC

Address City IN Zip: 845 South Elm Street, Scottsburg, IN 47170

Part 70 Operating Permit Renewal No.: T143-31697-00016

Permit Reviewer: Donald McQuigg

**Date:** June 23, 2012

Units	MMBtu/hr
heaters	2
RTO	1
boiler	20.9
process dryer	1.5
air makeup	8.2
779 1 1	

**Heat Input Capacity** 

HHV

Potential Throughput

MMBtu/hr

33.6

mmBtu mmscf

MMCF/yr

Total

33.6

1020

288.6

				Pollutant			
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO.
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.27	1.10	1.10	0.09	14.43	0.79	12.12

<sup>\*</sup>PM emission factor is filterable PM only. PM<sub>10</sub> emission factor is filterable and condensable PM<sub>10</sub> combined.

Boiler PM emissions = 0.17 tons/yr.

#### Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page for HAPs emissions calculations.

PM<sub>2.5</sub> emission factor is filterable and condensable PM<sub>2.5</sub> combined.

<sup>\*\*</sup>Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Page 6 of 7 TSD App A

Company Name: Genpak, LLC

Address City IN Zip: 845 South Elm Street, Scottsburg, IN 47170

Part 70 Renewal: 143-24660-00016

Permit Reviewer: Donald McQuigg

Date: June 23, 2012

	HAPs - Organics							
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyd e 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03			
Potential Emission in tons/yr	3.030E-04	1.731E-04	1.082E-02	2.597E-01	4.906E-04			

2.715E-01

		ŀ	IAPs - Metals		
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	7.214E-05	1.587E-04	2.020E-04	5.483E-05	3.030E-04

7.907E-04

Total HAPs = 2.723E-01

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4. See next page for Greenhouse Gas calculations.

#### Page 7 of 7 TSD App A

# Appendix A: Emissions Calculations Natural Gas Combustion Only MM BTU/HR <100 Greenhouse Gas Emissions

Company Name: Genpak, LLC

Address City IN Zip: 845 South Elm Street, Scottsburg, IN 47170

Part 70 Renewal: 143-24660-00016
Permit Reviewer: Donald McQuigg

Date: June 23, 2012

<u> </u>		Greenhouse Ga	S .
Emission Factor in ib/MMcf	CO2 120,000	CH4 2.3	N2O 2.2
Potential Emission in tons/yr	17,314	0.3	0.3
Summed Potential Emissions in tons/yr		17,315	
CO2e Total in tons/yr	-	17,419	

#### Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64. Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A. Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).





We Protect Hoosiers and Our Environment.

Michael R. Pence Governor

Thomas W. Easterly Commissioner

100 North Senate Avenue Indianapolis, Indiana 46204 (317) 232-8603 Toll Free (800) 451-6027 www.idem.IN.gov

April 17, 2013

Mr. Rich Rosenberg Genpak, LLC 845 S Elm St Scottsburg, IN 47170

Re: Public Notice

Genpak, LLC

Permit Level: Title V - Renewal Permit Number: 143 - 31697 - 00016

Dear Mr. Rosenberg:

Enclosed is a copy of your draft Title V - Renewal, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has submitted the draft permit package to the Scott Co Public Library, 108 S Main St in Scottsburg IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the Scott County Journal in Scottsburg, In publish this notice no later than April 27, 2013.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Don McQuigg, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-4240 or dial (317) 234-4240.

Sincerely,

Len Pogost

Len Pogost Permits Branch Office of Air Quality

> **Enclosures** PN Applicant Cover letter. dot 3/27/08





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Michael R. Pence Governor

Thomas W. Easterly Commissioner

100 North Senate Avenue Indianapolis, Indiana 46204 (317) 232-8603 Toll Free (800) 451-6027 www.idem.IN.gov

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

April 17, 2013

Scott County Journal Attn: Classifieds P.O. Box 159 Scottsburg, Indiana 47170

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Genpak, LLC, Scott County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than April 27, 2013.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost Permit Branch Office of Air Quality

Permit Level: Title V - Renewal Permit Number: 143 - 31697 - 00016

> Enclosure PN Newspaper.dot 3/27/08





We Protect Hoosiers and Our Environment.

Michael R. Pence Governor

Thomas W. Easterly Commissioner

100 North Senate Avenue Indianapolis, Indiana 46204 (317) 232-8603 Toll Free (800) 451-6027 www.idem.IN.gov

April 17, 2013

To: Scott Co Public Library

From: Matthew Stuckey, Branch Chief

> Permits Branch Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air

Permit

Applicant Name: Genpak, LLC

Permit Number: 143 - 31697 - 00016

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- **Draft Permit and Technical Support Document**

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

> **Enclosures** PN Library.dot 03/27/08





We Protect Hoosiers and Our Environment.

Michael R. Pence Governor

Thomas W. Easterly Commissioner

100 North Senate Avenue Indianapolis, Indiana 46204 (317) 232-8603 Toll Free (800) 451-6027 www.idem.IN.gov

#### **Notice of Public Comment**

**April 17, 2013** Genpak, LLC 143 - 31697 - 00016

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.

> Enclosure PN AAA Cover.dot 3/27/08





We Protect Hoosiers and Our Environment.

Michael R. Pence Governor

Thomas W. Easterly Commissioner

100 North Senate Avenue Indianapolis, Indiana 46204 (317) 232-8603 Toll Free (800) 451-6027 www.idem.IN.gov

# AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

April 17, 2013

A 30-day public comment period has been initiated for:

Permit Number: 143 - 31697 - 00016

Applicant Name: Genpak, LLC

Location: Scottsburg, Scott County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at: http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management Office of Air Quality, Permits Branch 100 North Senate Avenue Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at <a href="mailto:chammack@idem.IN.gov">chammack@idem.IN.gov</a> or (317) 233-2414.

Affected States Notification.dot 03/23/06



# Mail Code 61-53

IDEM Staff	LPOGOST 4/17	/2013		
	Genpak LLC 143	3 - 31697 - 00016 draft/	AFFIX STAMP	
Name and		Indiana Department of Environmental	Type of Mail:	HERE IF
address of		Management		USED AS
Sender		Office of Air Quality – Permits Branch	CERTIFICATE OF	CERTIFICATE
	·	100 N. Senate	MAILING ONLY	OF MAILING
		Indianapolis, IN 46204	MAILING ONE	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Rich Rosenberg Genpak LLC 845 S Elm St Scottsburg IN 47170 (Source CAATS)									
2		Edward W Rider Jr VP - Engineering Genpak LLC 26 Republic Plaza Middletown NY 10940 (RO CAATS)									
3		Scott County Health Department 1471 N. Gardner St Scottsburg IN 47170-7751 (Health Department)									
4		Scottsburg City Council and Mayors Office 2 E. McLain Street Scottsburg IN 47170 (Local Official)									
5		Scott Co Public Library 108 S Main St Scottsburg IN 47170-1892 (Library)									
6		Scott County Commissioners 1 E. McClain Ave., County Courthouse Scottsburg IN 4	17170 <i>(Local</i>	Official)							
7											
8											
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10											
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50,000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <i>Domestic Mail Manual R900</i> , S913, and S921 for limitations of coverage on inured and COD mail. See <i>International Mail Manual</i> for limitations o coverage on international
			mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.